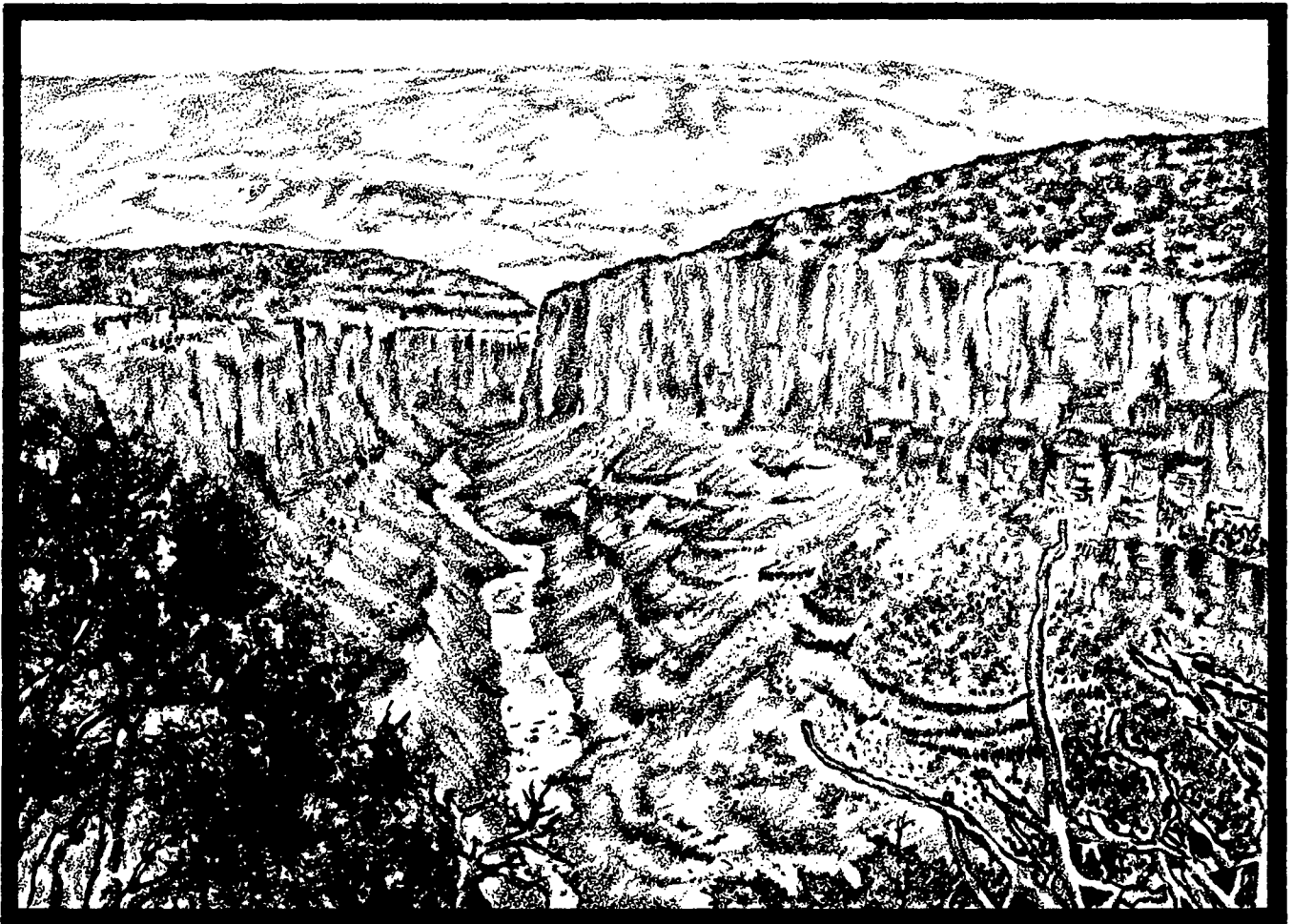


# **LITTLE SNAKE RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT**



U.S. Department of the Interior  
Bureau of Land Management  
Craig, Colorado District  
Little Snake Resource Area

Final  
September 1986



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT CRAIG DISTRICT OFFICE

455 Emerson Street  
Craig, Colorado 81625

Dear Reader:

Enclosed for your review is the Proposed Resource Management Plan (Proposed Plan) and Final Environmental Impact Statement (EIS) for the Little Snake Resource Area. The Proposed Plan and Final EIS is a refinement of the Preferred Alternative contained in the Draft EIS, consisting of public comment analysis and rewording and correcting for clarification. The Proposed Plan emphasizes not only the protection of fragile and unique resources but also the production and development of renewable and nonrenewable resources on public land administered by the Bureau of Land Management (BLM), i.e., surface lands and subsurface federal mineral estate; management does not apply to other uses unrelated to public land.

This Proposed Plan and Final EIS contains a summary of proposed management actions considered for each alternative in the Draft Resource Management Plan (RMP) and EIS and a summary of impacts by alternative. In addition, parts of Chapter 5, a record of public comment on the Draft RMP and EIS and the BLM's responses to those comments, and changes to the Draft RMP and EIS resulting from public review and comment are also contained in this document. The changes identified in the public review process did not require major revision of the Draft EIS. Therefore, the Draft RMP and EIS, which was distributed to the public in early February 1986, and this document together constitute the complete Final EIS. A limited number of copies of the Draft EIS are available at the above address.

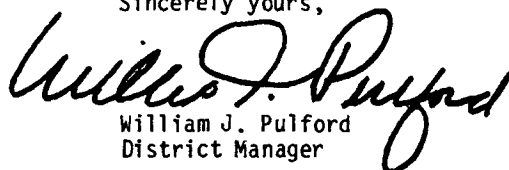
With the exception of the recommendations for West Cold Spring, Diamond Breaks, Cross Mountain, Ant Hills, Chew Winter Camp, Peterson Draw, and Vale of Tears wilderness study areas (WSAs), the Proposed Plan may be protested (the final wilderness recommendations for all WSAs except Teepee Draw will be made by the BLM through the Secretary of the Interior to the President and on to Congress for legislation that would formally designate them as wilderness or release them for uses other than wilderness). Protests should be sent to the Director (760), BLM, Premier Building, Room 906, 1725 I Street, N.W., Washington, D.C. 20240, within 30 days of the date of publication of the Notice of Availability by the U.S. Environmental Protection Agency in the Federal Register. Protests should include the following information:

- The name, mailing address, telephone number, and interest of the person filing the protest;
- A statement of the issue or issues being protested;
- A statement of the part or parts being protested;
- A copy of all documents addressing the issue or issues that were submitted during the planning process by the protesting party or an indication of the date the issue or issues were discussed for public records; and
- A short concise statement explaining why the proposed decision is wrong.

After the 30-day protest period and Governor's Consistency Review, the BLM Colorado State Director will approve the plan, excluding any portion under protest. A record of decision, outlining the Resource Management Plan for the Little Snake Resource Area, will then be published.

We would like to thank the agencies, organizations, and individuals whose comments and suggestions have helped us to prepare a plan that will lead to more effective management of public lands. Your interest is appreciated.

Sincerely yours,

  
William J. Pulford  
District Manager

# **LITTLE SNAKE RESOURCE MANAGEMENT PLAN**

and

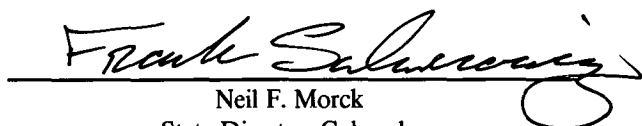
## **FINAL ENVIRONMENTAL IMPACT STATEMENT**

Moffat, Rio Blanco, and Routt Counties, Colorado

**(FES 86-15)**

**U.S. DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
CRAIG DISTRICT OFFICE  
LITTLE SNAKE RESOURCE AREA**

**FES 86-15**

 **Acting**  
Neil F. Morck  
State Director, Colorado

Type of Action: Administrative (X) Legislative ( )

**Abstract:** The Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS), which is incorporated into this Proposed RMP and Final EIS by reference, addresses future management options for approximately 1.3 million surface acres of public land and 2.4 million acres of federal subsurface mineral estate administered by the Bureau of Land Management in the Little Snake Resource Area within Moffat, Rio Blanco, and Routt counties, Colorado. The alternatives, designed to provide a variation from resource protection to resource production contained in the Draft RMP and EIS, include: (1) Current Management Alternative, (2) Energy and Minerals Alternative, (3) Commodity Production Alternative, (4) Renewable Resource Alternative, (5) Natural Environment Alternative, and (6) Preferred Alternative. A discussion of the environmental, economic, and social consequences of implementing each of these alternatives is also included in the Draft RMP and EIS.

The Proposed Plan and Final EIS were developed, in part, from comments received from the public on the Draft RMP and EIS. The Proposed Plan is a refinement of the Preferred Alternative contained in the Draft RMP and EIS. When the Proposed Plan is completed, it will provide a comprehensive framework for managing and allocating public land uses and resources during the next 20 years. The Proposed Plan and Final EIS will also provide the basis for wilderness recommendations by the Secretary of the Interior regarding final designation by Congress (these recommendations will be incorporated into a wilderness study report and attendant final wilderness EIS). The Draft RMP and EIS should be used in conjunction with this document, which also contains modifications and corrections to the draft and comments received during the public review process.

For Further Information Contact: Duane Johnson, Program Manager, BLM, Craig District Office, 455 Emerson, Craig, Colorado;  
Telephone (303) 824-8261.

Protests must be received within 30 days of the date of publication of the Notice of Availability by the U.S. Environmental Protection Agency in the Federal Register.



# United States Department of the Interior

IN REPLY REFER TO:

CO-934

1614

## BUREAU OF LAND MANAGEMENT

COLORADO STATE OFFICE  
2850 YOUNGFIELD STREET  
LAKEWOOD, COLORADO 80215

Dear Recipients of the Final Little Snake Resource Management Plan and Environmental Impact Statement:

Our staff has discovered that during development of the Final Little Snake Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for lands managed by the Bureau of Land Management in Colorado portions of the document were inadvertently omitted. The omissions include portions of the Coal Priority-Use Area and Other Mineral Priority-Use Area descriptions, all of the Oil and Gas Priority-Use Areas description, and the section entitled Text Changes.

Please (1) insert the enclosed errata page for priority-use descriptions in the final RMP/EIS in the second column on page I-20 between the paragraphs entitled "Forest Lands and Woodlands" and "Recreation", (2) replace page IV-12 of the final RMP/EIS with the enclosed errata page IV-12, which is to be (3) followed by errata pages IV-13 and IV-14, also enclosed.

We have requested that the Environmental Protection Agency publish notice in the Federal Register noting these omissions and extending the period for comments due on the final RMP/EIS to November 24, 1986. We regret these omissions and trust they have not caused any inconvenience.

Sincerely,

Neil F. Morck  
State Director

Enclosures



**ERRATA, Final Little Snake RMP/EIS (Insert on page I-20, 2nd col., between last full and partial paragraph)**

*Recreation.* Lands would remain open to dispersed recreation until it conflicted with coal development. Limited development of recreation sites could be allowed in areas proposed for underground mining.

*Realty Actions.* Realty actions such as rights-of-way, leases, permits, and land adjustments would be allowed, as long as they did not interfere with coal development.

**Oil and Gas Priority-Use Areas**

*Compatible Uses*

Uses that could occur on these lands are:

*Coal.* Lands would remain open to federal coal leasing within the coal planning area. Concurrent development of oil/gas and coal resources that did not result in a significant loss of oil and gas production or a significant loss of federal coal would be encouraged. Any conflicts arising from concurrent oil and gas and coal development would be settled by the operators.

*Other Minerals.* Federal lands would remain open to exploration and development of other leasable minerals and to location of mining claims. Development of other federal leasable minerals and federal material sales would be allowed, provided they did not conflict with the development of oil and gas.

*Livestock Grazing.* Lands would remain open to livestock grazing. New projects or improvements could be implemented on BLM surface, provided they did not conflict with oil and gas development. Stipulations may be used to maintain existing range improvements and to direct reclamation efforts.

*Wildlife.* Intensive or limited levels of management could be implemented, provided practices and improvements did not conflict with oil and gas development. Stipulations may be used to direct reclamation efforts and protect wildlife habitat.

*Wild Horses.* Lands would remain open to wild horse use, but limits could be placed on types of projects or improvements developed for wild horses so as not to conflict with oil and gas development.

*Forest Lands and Woodlands.* Lands would remain open to harvesting of forest and woodland products on BLM surface until it conflicted with oil and gas development. Disposal of timber products that are impacted by oil and gas surface disturbances would be stipulated in leases and development plans.

*Recreation.* Developed recreation sites could be established, provided they were designed so as not to conflict with the development of oil and gas. Lands would remain open to dispersed recreation.

*Realty Actions.* Realty actions such as rights-of-way, leases, permits, and land adjustments would be allowed, as long as they did not interfere with oil and gas development.

**Other Mineral Priority-Use Areas**

Priority areas for other minerals include areas with mining claims and localities having potential for sand and gravel sales and development potential for leasable minerals other than coal, oil and gas, and geothermal resources.

*Compatible Uses*

Uses that could occur on these lands are:

*Coal.* Coal development could occur within the coal planning area, provided it did not conflict with other mineral development.

*Oil and Gas.* Lands would remain open for oil and gas leasing and development, provided it did not conflict with other mineral development.

*Livestock Grazing.* Lands would remain open to livestock grazing. New projects or improvements could be implemented on BLM surface, provided they did not conflict with other mineral development. Stipulations may be used to maintain existing range improvements and to direct reclamation efforts.

*Wildlife.* Intensive or limited levels of management could be implemented, provided practices and improvements did not conflict with mineral developments. Stipulations may be used to protect wildlife habitat and direct reclamation.

*Wild Horses.* Lands would remain open to wild horse use, but limits could be placed on types of projects or improvements developed for wild horses so as not to conflict with mineral developments.

*Forest Lands and Woodlands.* Lands would remain open to harvesting of forest and woodland products until it conflicted with mineral development. When mining occurs, proper disposal of timber products would be required.

## TEXT CHANGES

quality of water in surface or underground water systems that supply alluvial valley floors, will be deferred with development of specific mine plans or as more data becomes available

### Page A2-23

First column, last paragraph, second sentence. This sentence should read: Unsuitability determinations on these areas will be deferred until development of mine plans or as more data becomes available.

## Appendix 4

### Page A4-1

Second column, second paragraph, last sentence. Add the word "existing" before the word preference and add the word "additional" before the word data.

## Appendix 7

### Page A7-1

First column, first paragraph, add the following text.

Soils at this level often include large areas that, because of steepness of slope, undeveloped profiles, or rocky outcrops, are mapped at the great group level rather than at more specific soil series. In these situation, there is no range site correlated. Appendix 5 lists these areas as landforms and Appendix 6 lists them as "no seral stage."

First column, third paragraph. Change "1984" to "1983."

First column, list number 2 under the heading Improve (I). Change text to read: Significant unresolved conflicts or controversy may exist between livestock interests and other resources such as riparian areas, critical big game habitat, fragile soil areas, etc.

List number 5 under the heading Improve (I). Change text to read: The allotment is currently in unsatisfactory livestock forage condition and is not near its potential livestock forage production.

Second column, add the following text as list number 4:

Once final categorization has been completed on the allotments, they will be ranked for range improvement expenditures. This ranking will be published in the rangeland program summary (RPS) as a supplement to the Record of Decision.

A number of factors would be considered in this ranking process which would ensure that limited range improvement money would be spent on those projects and allotments that could yield the greatest benefits for dollars invested.

Major considerations for investment would include allotment categorization (generally I category would be those higher priority allotments), riparian areas, permittee's willingness to contribute, benefit/cost analysis results, and other significant resource conflicts. Rankings would be made annually to accommodate changing situations.

Second column, last paragraph, second sentence, change "108" to "256."

## Appendix 9

### Page A9-1

First column, second paragraph, last line. Add the following text: Intensive management practices would be developed for all I category allotments to improve existing resource conditons. M. allotments would be maintained under present management practices. Less intensive management practices would be developed for C allotments to prevent deterioration of current resource conditions and potential for improved productivity is limited. The order of priority for these systems and their associated projects will be provided in the periodic range program summary (RPS).

First column, list number 2 under heading Preference Number. Delete the words "or additional cross fences." List number 3, add the following to the end of the sentence: "... or other management practices."

Second column, list number 10. Change text to read: Consolidate this allotment with the following adjacent allotment:

- |         |            |
|---------|------------|
| a. 4218 | Yellow Cat |
| b. 4521 | Greasewood |

Second column, list number 1 under heading Reference Number. Change text to read: This allotment has some areas that are not properly utilized, because of uneven livestock distribution.

### Page A9-2

First column, list number 3. Change sublist c. to Canyon Creek, and change sublist d. to Shell Creek. Add the following:

## TEXT CHANGES

- h. Morgan Creek
- i. West Timberlake Creek
- j. Beaver Creek

Second column, list number 10. Change text to read: This allotment could be more efficiently managed as an additional pasture of an adjacent allotment held by the same livestock operator.

Second column, List number 11. Change the text to read: Periodic influx of large concentrations of wildlife compete for forage and space with livestock operations.

### Appendix 11

#### Page A11-1

First column, first paragraph, end of first sentence. Add the following text:

These proposed projects primarily indicate the expected need for or potential for development within these allotments. As resource conditions change, or as more information becomes available, some of these projects may no longer be necessary or may not be economically feasible to develop as proposed. Also, new projects may be proposed to accommodate intensive management systems. As these systems have not been developed yet, it is not known at this time what projects may be needed to fully implement these grazing systems.

As for all range improvement projects, an environmental analysis will be prepared to address the site-specific impacts of each project.

First column, first paragraph, second sentence. Delete the words "initial short-term."

#### Page A17-2

First column, first paragraph under Surface and Groundwater Management Actions heading. Delete "under the Renewable Resource and Natural Environment alternatives."

#### Page A22-2.

Second column, first complete paragraph first sentence. Delete this sentence.

### Appendix 24

#### Page A24-1

Second column. Add the following legals to All Alternatives except the Current Management Alternative.

T. 4 N., R. 86 W., Sec. 24: W1/2 SE1/4 SW1/4, 20 acres

T. 6 N., R. 95 W., Sec. 5: lot 8, (10 acres within)

### Glossary

#### Page G-1

After AUM, insert Bankhead Jones Act of 1937.

This act was designed as a relief measure for farmers as a result of the severe drought during the 1930s. Title III of the act enabled the federal government, through the Department of Agriculture, to purchase patented homesteads. Jurisdiction of the acquired lands was transferred to the Department of Interior by Executive Order 10046 of March 25, 1949, for administration under the Taylor Grazing Act. The status of mineral estate on those lands is complex because of differing methods of disposal and acquisition.

#### Page G-2

Insert after Conglomerate:

Critical Habitat. Habitat that is essential to the maintenance of a given species or population, which, if lost or modified, would adversely affect that species or population.

#### Page G-3

Insert after Ecological Seral Stage:

Edge Effect. The influence of one adjoining plant community on the margin of another affecting composition and density of the population.

#### Page G-4

Placer. Text should be changed to read: A glacial or alluvial deposit of sand or gravel containing eroded particles of valuable minerals. Such a deposit is washed to extract its mineral content. In the U. S. mining law, mineral deposits, not veins in place, are treated as placers, so far as locating, holding, and patenting are concerned. Various minerals besides metallic ores have been held to fall under this

## **TEXT CHANGES**

provision; however, some minerals were removed from the operation of the general mining laws by the Mineral Leasing Act of February 25, 1920 (41 State. 4371).

Add to Livestock Forage Condition:

Satisfactory - Those acres that are producing close to thier potential of livestock forage.

Unsatisfactory - Those acres that have a potential for a significant increase in livestock forage through cost effective livestock management. Unsatisfactory livestock forage condition does not connote low seral stage (poor ecological condition). Many acres in unsatisfactory livestock forage condition are in medium or high seral stage (fair or good ecological condition).

### **Page G-6**

Insert after unconformity: Unitized those lands within a unit area which are committed to an approved agreement or plan.

### **Page G-5**

Insert after Sand Stone: Satisfactory Livestock Condition. See Livestock Forage Condition.

### **Page G-6**

Insert after Uncomformity: Unsatisfactory Livestock Forage Condition. See Livestock Forage Condition.

## **References**

### **Page R-2**

Add the following references.

Colorado Department of Health. 1984. Water Quality Control Commission. The Basic Standards and Methodologies. Denver, CO.

. 1983. Water Quality Control Commission. Classification and Numeric Standards for South Colorado River Basin. Denver, CO.

### **Page R-4**

Add the following reference.

Duncan, A.C.; Ugpand, R.C.; Bennett, J.D.; and Wilson, E.A. 1984. Water Resources Data, Colorado — Water Year 1984, Vol. 3. U.S. Geological Survey Water-Data Report CO-84-3, State of Colorado.

### **Page R-8**

Add the following reference

Steinheimer, J.T.; Ugpand, R.C.; Burch, H.E.; and Wilson, E.A. 1983. Water Resources Data, Colorado — Water Year 1983, Vol. 3. U.S. Geological Survey Water-Data Report CO-83-3, State of Colorado.

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## **MAP LIST**

Proposed Plan

Sec. 3 – Grazing Allotments

Oil and Gas Favorability

# SUMMARY

This Final Resource Management Plan and Environmental Impact Statement (RMP/EIS) identifies and analyzes the future options for managing the public lands in the Little Snake Resource Area in northwest Colorado. The resource area encompasses an area of 3.2 million acres in the Bureau of Land Management's (BLM) Craig District. Management decisions have been proposed for the 2.4 million acres within the resource area for which BLM has administrative responsibility.

The resource management plan is being prepared using the BLM's planning regulations issued under the authority of the Federal Land Policy and Management Act of 1976.

The planning process began in July 1983 with issue identification. Public meetings were held in Denver, Steamboat Springs, and Craig, Colorado. Written comments were also solicited to determine the scope of the document and identify the concerns of the public that should be addressed. The issues identified by both the public and BLM during this process, which are addressed in the RMP, fall into five major issue categories:

Issue 1. Determination of suitability of certain areas for leasing and development—

- Issue 1-1. Coal
- Issue 1-2. Oil and Gas Development
- Issue 1-3. Other Mineral Development

Issue 2. Management of ecological factors, including vegetation, to best meet livestock, wildlife, and wild horse needs and demand for forest/woodland products—

- Issue 2-1. Livestock Grazing
- Issue 2-2. Wildlife Habitat
- Issue 2-3. Threatened/Endangered, Candidate, and BLM Colorado Sensitive Plant Species
- Issue 2-4. Wild Horses
- Issue 2-5. Soils
- Issue 2-6. Water Resources
- Issue 2-7. Forest Lands
- Issue 2-8. Woodlands
- Issue 2-9. Fire Management

Issue 3. Determination of need for special management designations—

- Issue 3-1. Wilderness
- Issue 3-2. Natural History
- Issue 3-3. Recreation
- Issue 3-4. Off-Road Vehicle Designations
- Issue 3-5. Cultural Resources
- Issue 3-6. Paleontological Resources

Issue 4. Determination of needed realty actions—

- Issue 4-1. Acquisition/Disposal Areas

Issue 4-2. Major Rights-of-Way

Issue 5. Determination of access and transportation needs—

- Issue 5-1. Access Acquisition
- Issue 5-2. Boundary Marking
- Issue 5-3. Road Requirements

Six multiple-use alternatives were developed to respond to these issues. Each alternative proposes different solutions to these issues and concerns and describes the different management options available to BLM for the Little Snake Resource Area. Each of the alternatives is a complete, reasonable, and implementable plan that provides a framework for managing the public lands and allocating the resources in the resource area. These alternatives are summarized below and are described in detail in Chapter 2 of the Draft RMP/EIS. A comparative summary of the management actions proposed under each alternative is included in Table S-1 and S-2.

Initially, five alternatives were analyzed: Current Management (No Action) Alternative, Energy and Minerals Alternative, Commodity Production Alternative, Renewable Resource Alternative, and Natural Environment Alternative. The potential impacts to the environment and nearby communities of implementing each alternative were examined and presented to BLM management. Then, based on this analysis, BLM policy and goals, and the responsiveness of each alternative to the issues identified at the beginning of the process, a Preferred Alternative was described and the environmental consequences of that alternative were predicted. A comparative summary of the environmental consequences of each alternative is included in Table S-3. The impacts anticipated from all of these alternatives are described in Chapter 4 and a comparative summary of impacts is included in Chapter 2 of the Draft RMP/EIS.

The following description summarizes the key points of each alternative.

## CURRENT MANAGEMENT ALTERNATIVE

The Current Management Alternative is the "No Action" alternative. It reflects the current management of the Little Snake Resource Area and portrays how it would continue to be managed under existing management policy and practices. Decisions in the various management framework plans are reflected to the degree that they are consistent with current BLM policy, existing management practice,

etc. A change would be required in the status of the eight wilderness study areas (WSAs) in order to comply with provisions of the Federal Land Policy and Management Act, which requires that suitable or unsuitable recommendations be made for all WSAs. The Current Management Alternative provides a baseline against which to compare other alternatives.

## **ENERGY AND MINERALS ALTERNATIVE**

The Energy and Minerals Alternative would emphasize the production and development of energy and other mineral resources. Energy resources, minerals of high interest, rights-of-way, and other support actions would be favored to help meet nationwide needs for energy and minerals.

The management of threatened and endangered species, wild horses, paleontological resources, and rights-of-way would continue as described under the Current Management Alternative.

## **COMMODITY PRODUCTION ALTERNATIVE**

The Commodity Production Alternative would emphasize both mineral and livestock production from public lands.

The management of threatened and endangered species, paleontological resources, and rights-of-way would continue as described under the Current Management Alternative.

## **RENEWABLE RESOURCE ALTERNATIVE**

The Renewable Resource Alternative would emphasize the production and management of renewable resources. It would maximize the sustained yield of renewable goods and services from public lands to meet local, regional, and national needs.

The management of threatened and endangered species, wild horses, and paleontological resources would continue as described under the Current Management Alternative.

## **NATURAL ENVIRONMENT ALTERNATIVE**

The Natural Environment Alternative would emphasize the protection and enhancement of the natural environment and resources of substantial scientific interest. It would favor management and use that do not detract from the natural setting.

The management of threatened and endangered species would continue as described under the Current Management Alternative.

## **PREFERRED ALTERNATIVE**

The Preferred Alternative would provide an optimum multiple-use mix by balancing conflicts and providing a variety of uses. It would provide the necessary constraints for protecting renewable resources from irreversible decline, while accommodating production of minerals, livestock grazing, off-road vehicles, recreation, and other uses.

The management of threatened and endangered species and wild horses would continue as described under the Current Management Alternative.

The Draft RMP/EIS was published January 30, 1986, with a public comment period of February 7, 1986, to May 9, 1986. Public comments received on the draft did not require any significant changes in data, analysis, or the expected impacts of the alternative plans analyzed. Therefore, the entire environmental impact statement has not been reprinted. Only brief summaries of the alternatives and impacts, those minor changes in data and impact analysis, additional coordination and public participation activities, the Proposed Plan, public comments, and our responses have been included in this Final RMP/EIS.

## **PROPOSED PLAN**

The proposed plan was developed from: 1) issues raised throughout the multiple-use land planning process, 2) decision criteria (page 1-5 of the Draft RMP/EIS), 3) public input received during the 90-day comment period and at meetings and workshops on the RMP/EIS, and 4) the environmental analyses developed on the six alternatives. If the proposed plan is implemented, use of forage and other natural resources will be refined and optimized, energy sources will be available, and critical resource values such as wildlife; cultural resources; threatened, endangered, and sensitive species will be protected.



## **DIFFERENCES BETWEEN THE PROPOSED PLAN AND THE PRE- FERRED ALTERNATIVE**

The proposed plan varies from the Preferred Alternative in the following ways. The plan: 1) recommends Cross Mountain as suitable for inclusion in the National Wilderness

Preservation System; 2) recommends four wilderness study areas currently being evaluated under Section 202 of the Federal Land Policy and Management Act—Ant Hills, Chew Winter Camp, Peterson Draw, and Vale of Tears—as nonsuitable for wilderness designation, but they would be forwarded to Congress for final decision; 3) administers Wild Mountain as an extensive recreation management area; 4) revises the definitions of compatible and excluded uses for each Management Priority Area; and 5) recommends two areas for disposal that were previously recommended for retention.

TABLE S-1

## SUMMARY OF PROPOSED MANAGEMENT ACTIONS BY ALTERNATIVE

Issues	All Alternatives	Current Management	Energy and Minerals
Coal	The application of the screening procedures would be used to identify lands acceptable for further leasing consideration.	Approximately 172,200 acres (containing an estimated 2.8 billion tons) would be available for further consideration for leasing (approximately 131,200 acres for surface/underground; approximately 41,000 acres for underground only).	Approximately 638,800 acres (containing an estimated 5.8 billion tons) would be available for further consideration for leasing (approximately 465,700 acres for surface/underground; approximately 173,100 acres underground only).
Oil and Gas	Public land would be available for leasing (except WSAs pending congressional action, or areas identified in the Umbrella Environmental Assessment for Oil and Gas activities).	1.15 million acres would be open to leasing with standard lease terms; 685,927 acres would be open with seasonal restrictions (critical wildlife habitat); 16,240 acres open with no surface occupancy (critical wildlife habitat); 27,424 acres would be closed to leasing as identified in the Little Snake Resource Area Umbrella Environmental Assessment for Oil and Gas Activities.	1.10 million acres would be open to leasing with standard lease terms; 685,927 acres would be open with seasonal restrictions (critical wildlife habitat); 17,900 acres would be open with avoidance stipulations (ACECs); 38,070 acres would be open with no surface occupancy (critical wildlife habitat; RNAs; recreational areas); 35,380 acres would be closed to leasing (proposed wilderness).
Other Mineral Development	Public land would generally remain open to mineral entry and development. The sale of common variety mineral materials would continue on a case-by-case basis. Geothermal energy resources or other leasable minerals would be leased as the demand occurred.	Same	Same, except that 35,380 acres would be withdrawn from mineral entry (proposed wilderness)

Commodity Production	Renewable Resource	Natural Environment	Preferred Alternative
Approximately 638,800 acres (containing an estimated 5.8 billion tons) would be available for further consideration for leasing (approximately 418,700 acres for surface/underground; approximately 220,100 acres for underground only).	Approximately 367,100 acres (containing an estimated 5.2 billion tons) would be available for further consideration for leasing (approximately 246,00 acres for surface/underground; approximately 121,100 acres for underground only).	Approximately 344,900 acres (containing an estimated 4.9 billion tons) would be available for further consideration for leasing (approximately 225,300 acres for surface/underground; approximately 119,600 acres for underground only).	Approximately 638,800 acres (containing an estimated 5.8 billion tons) would be available for further consideration for leasing (approximately 396,500 acres for surface/underground; approximately 242,300 acres for underground only).
1.08 million acres would be open to leasing with standard lease terms; 685,927 acres would be open with seasonal restrictions (critical wildlife habitat); 280 acres would be open with avoidance stipulations (ACEC); 94,970 acres would be open with no surface occupancy (critical wildlife habitat; RNAs; recreation areas); 14,081 acres would be closed to leasing (proposed wilderness).	985,156 acres would be open to leasing with standard lease terms; 685,927 acres would be open with seasonal restrictions (critical wildlife habitat); 6,780 acres would be open with avoidance stipulations (ACECs); 143,656 acres would be open with no surface occupancy (critical wildlife habitat; RNAs; recreation areas; fragile soils); 56,881 acres would be closed to leasing (proposed wilderness).	1.00 million acres would be open to leasing with standard lease terms; 685,927 acres would be open with seasonal restrictions (critical wildlife habitat); 6,780 acres would be open with avoidance stipulations (ACECs); 93,775 acres would be open with no surface occupancy (critical wildlife habitat; RNAs; recreation areas; fragile soils); 90,887 acres would be closed to leasing (proposed wilderness).	1.05 million acres would be open to leasing with standard lease terms; 685,927 acres would be open with seasonal restrictions (critical wildlife habitat); 18,180 acres would be open with avoidance stipulations (ACECs); 35,840 acres would be open with performance standards (fragile soils); 51,310 acres would be open with no surface occupancy (critical wildlife habitat; RNA; recreation area); 36,240 acres would be closed to leasing (proposed wilderness).
Same, except that 14,081 acres would be withdrawn from mineral entry (proposed wilderness).	Same, except that 56,881 acres would be closed to mineral entry (proposed wilderness).	Same, except that 90,887 acres would be closed to mineral entry (proposed wilderness).	Same, except that 39,240 acres would be closed to mineral entry (proposed wilderness and ACEC).

TABLE S-1 (Continued)

## SUMMARY OF PROPOSED MANAGEMENT ACTIONS BY ALTERNATIVE

Issues	All Alternatives	Current Management	Energy and Minerals
Livestock Grazing	All allotments would be assigned to one of three management categories. Appropriate livestock use levels would be based on a combination of monitoring data and baseline inventory data. Grazing Preference would remain active in all allotments until reliable data were available.	Use of full preference (166,895 AUMs) would be authorized and present management on all allotments (1,236,540 acres), existing AMPs (96,326 acres), and implementation of range improvements would continue.	Use of 151,966 AUMs would be authorized; present management on 176,500 acres (242 allotments) would continue; land treatments on 111 allotments would increase available forage by 11,300 AUMs; 355 projects would be developed in 86 allotments, and management systems would be developed for all allotments.
Wildlife Habitat	Impacts to wildlife habitat would be mitigated; monitoring studies would be initiated; habitat management plans would be implemented; threatened, endangered, and sensitive species habitat would be protected; and seasonal restrictions would be imposed to development activities within certain areas.	Habitat would be provided on BLM lands to support approximately 63,400 mule deer, 6,700 elk, 6,300 pronghorn and 70 bighorn sheep contributing to total resource area populations of 165,750 deer, 21,500 elk, 6,400 pronghorn, and 70 bighorn sheep on an area-wide basis.	Habitat would be provided on BLM lands to support 53,900 mule deer, 5,500 elk, 5,300 pronghorn, and 70 bighorn sheep contributing to total resource area populations of populations of 89,500 mule deer, 18,300 elk, 7,100 pronghorn, and 70 bighorn sheep area-wide; livestock/big game winter and spring range use areas would be monitored.
Threatened/Endangered, Candidate, and Colorado BLM Sensitive Plants	No-surface-occupancy stipulations to protect identified threatened, endangered, and candidate species and avoidance stipulations to protect identified sensitive plants would be imposed; plant inventories would be conducted.	No areas would be designated to protect sensitive plants.	Designation of Ink Spring RNA and Cross Mountain Canyon, Irish Canyon, and Lookout Mountain ACECs would be supported to protect Colorado BLM sensitive plants (19,380 acres).
Wild Horses	Wild Horses would be limited to the Sand Wash Basin; annual counts and vegetation monitoring would be conducted.	The herd would be monitored at 160 horses.	Same as Current Management.

Commodity Production	Renewable Resource	Natural Environment	Preferred Alternative
Use of 193,678 AUMs would be authorized; present management on 122,800 acres (200 allotments) would continue; land treatments on 119 allotments would increase available forage by 16,300 AUMs; projects would be developed on 87 allotments; and management systems would be developed for all allotments.	Use of 157,328 AUMs would be authorized; present management on 209,674 acres (252 allotments) would continue; land treatments on 100 allotments would increase available forage by 10,249 AUMs; and management systems would be developed for all allotments.	Use of 124,487 AUMs would be authorized; present management would continue on 298,042 acres (286 allotments); preference would be adjusted on 95 allotments (916,007 acres) to provide for other demands; grazing would be restricted on 41,841 acres; grazing would be eliminated on 42,110 acres; and there would be no new projects.	Anticipated grazing level of 148,821 AUMs would be allowed; present management would continue on 257,077 acres (278 allotments); land treatments on 68 allotments would increase available forage by 9,521 AUMs; projects would be developed on 69 allotments; and management systems would be developed for all allotments.
Habitat would be provided on BLM lands to support 49,620 mule deer, 5,000 elk, 4,900 pronghorn, and 70 bighorn sheep contributing to total resource area populations of 82,700 mule deer, 16,800 elk, 6,600 pronghorn, and 70 bighorn sheep.	Habitat would be managed on BLM lands to support maximum big game population levels of 73,000 mule deer, 7,400 elk, 6,300 pronghorn, and 70 bighorn sheep contributing to total resource area populations of 121,600 mule deer, 24,700 elk, 8,350 pronghorn, and 70 bighorn sheep; habitat would be provided to support 15% increase in numbers by the year 2000; livestock would be removed from livestock/wildlife conflict areas; and management would be intensified in riparian areas would be intensified.	All habitat would be managed for natural values; wildlife would be favored over livestock; habitat would be provided on BLM lands to support 66,400 mule deer, 6,500 elk, 6,300 pronghorn, and 70 bighorn sheep contributing to total resource area populations of 110,600 mule deer, 21,700 elk, 8,350 pronghorn (CDOW 1988 objectives), and 70 big-horn sheep area-wide; and riparian/aquatic activity plans would be developed.	Habitat would be provided on BLM to support 61,000 mule deer, 5,700 elk, 5,600 pronghorn, and 70 bighorn sheep contributing to total resource area populations of 102,000 mule deer, 18,400 elk, 7,500 pronghorn and 70 bighorn sheep area-wide; livestock/wildlife conflicts would be resolved on a case-by-case basis; and conflict areas and critical habitats would be monitored.
Designation of Ink Springs and Limestone Ridge RNAs and Cross Mountain Canyon and Hells Canyon ACECs would be supported to protect sensitive plants (3,110 acres).	Designation of Horse Draw, Ink Springs, Limestone Ridge RNAs and Lookout Mountain, Cross Mountain, Hells Canyon, and Irish Canyon ACECs would be supported to protect sensitive plants (21,700 acres).	Designation of G-Gap, Horse Draw, Ink Springs, and Limestone Ridge RNAs and Cross Mountain Canyon, Hells Canyon, Irish Canyon and Lookout Mountain ACECs would be supported to protect sensitive plants (21,975 acres).	Designation of Limestone Ridge RNA, and Cross Mountain Canyon, Irish Canyon, and Lookout Mountain ACECs would be supported to protect sensitive plants (22,530 acres).
The herd would be reduced to 65 horses.	Same as Current Management.	The herd would be increased to 470 horses and new reservoirs and wells would be developed to provide water.	Same as Current Management.

TABLE S-1 (Continued)

## SUMMARY OF PROPOSED MANAGEMENT ACTIONS BY ALTERNATIVE

Issues	All Alternatives	Current Management	Energy and Minerals
Soil and Water Resources	Special stipulations would be applied to surface-disturbing activities on a case-by-case basis; plans would be developed for stabilizing known areas of high erosion; precipitation, sediment, and salinity stations would be monitored; water quality and quantity inventory would be completed; quantification of reserved water rights would be completed; appropriative water rights would be sought; soil surveys would be conducted in timber harvest areas; and watershed activity plans would be developed.	Salinity control projects would be implemented where deemed beneficial.	Groundwater inventory would be initiated; on-site studies would be performed in coal mine areas; impacts of development activities would be monitored; seasonal road closures would be imposed; and salinity control project would be implemented.
Forest Lands and Woodlands	Easements for future sales would be acquired; non-stocked and poorly stocked stands would be regenerated; public harvest areas would be opened.	7,000 acres of commercial forest land and 40,900 acres of productive-operable woodland would be intensively managed.	6,180 acres of commercial forest land and 38,020 acres of productive-operable woodland would be intensively managed. Forest management plans for Diamond Peak/Middle Mountain, and Douglas Mountain would continue. A woodland management plan would be developed for the area.
Fire Management	None.	Suppression in certain natural burn areas (WSAs) would be limited; the remainder of the Resource Area would be managed as a suppression zone; and prescribed burns would be on a case-by-case basis.	A fire management plan would be developed for full/limited suppression and prescribed burns.

Commodity Production	Renewable Resources	Natural Environment	Preferred Alternative
Same as Energy and Minerals.	Same as Energy and Minerals, plus watershed condition would be analyzed; no-surface-occupancy would be stipulated in badlands and highly erodible areas.	Same as Renewable Resource, plus aquisition of nonpublic lands which produce high sediment or salinity would be provided in watersheds where the majority of the land is public.	Same as Energy and Minerals, plus oil/gas lease parcels in fragile soil and water areas would be reviewed on a case-by-case basis; special performance standards would be imposed; no surface occupancy would be allowed directly adjacent to perennial waters.
6,480 acres of commercial forest land and 38,550 acres of productive-operable woodland would be intensively managed. Forest management plans would be revised; an intensive woodland inventory would be conducted; and a woodland management plan would be developed.	Same as Commodity Production.	5,280 acres of commercial forest land and 36,100 acres of productive-operable woodland would be intensively managed; forest management plans would be revised; intensive forest/woodland management in special management areas would be restricted; intensive management practices would be utilized in forestry management priority areas only.	6,330 acres of commercial forest land and 37,600 acres of productive-operable woodland would be intensively managed; existing forest management plans would continue to be implemented.
Same as Energy and Minerals	Same as Energy and Minerals	Same as Energy and Minerals	Same as Energy and Minerals

TABLE S-1 (Continued)

## SUMMARY OF PROPOSED MANAGEMENT ACTIONS BY ALTERNATIVE

Issues	All Alternatives	Current Management	Energy and Minerals
Wilderness	All WSAs would be managed in compliance with BLM's Interim Management Policy until they are reviewed and acted on by Congress or the State Director; designated wilderness would be managed in compliance with BLM's Wilderness Management Policy and Wilderness Act of 1964.	All WSAs would be recommended as nonsuitable for designation.	Diamond Breaks WSA (35,380 acres) would be recommended as suitable for designation; the other 7 WSAs would be recommended as nonsuitable for designation.
Natural History	Avoidance or no-surface-occupancy stipulations would be imposed, as needed, to protect special values in areas of critical environmental concern or research natural areas.	No special management areas would be designated.	Irish Canyon, Lookout Mountain, and Cross Mountain Canyon ACECs (19,100 acres), and Ink Springs, Vermillion Creek, Vermillion Bluffs, and Calico Draw RNAs (1,710 acres) would be designated.
Recreation	Recreational information would be provided to the public; a sign plan would be implemented; public access for recreational use would be acquired; and visual resources would be evaluated as a part of activity and project planning.	Cedar Mountain recreation management area (880 acres) would be developed; Willow Creek would be managed as a recreational area.	Cross Mountain (12,700 acres) would be administered as a special recreation management area; Vale of Tears area (7,420 acres) would be managed to maintain semiprimitive nonmotorized settings and opportunities.
Off-Road Vehicle Designations.	Off-road vehicle opportunities would continue within the Resource Area; use in certain areas would be restricted to provide for public safety, protect resource values or minimize conflicts.	1,131,110 acres would be designated open, 168,000 acres limited (to existing roads), and 890 acres closed.	982,490 acres would be designated open, 262,000 acres limited (existing/ designated roads and trails, permitted uses), and 55,510 acres closed.



Commodity Production	Renewable Resource	Natural Environment	Preferred Alternative
Cross Mountain WSA (14,081 acres) would be recommended as suitable for designation; the other 7 WSAs would be recommended as nonsuitable for designation.	All of the Diamond Breaks (35,380 acres), Cross Mountain (14,081 acres), and Vale of Tears (7,420 acres) WSAs would be recommended as suitable for designation; the other 5 WSAs would be recommended as nonsuitable for designation.	All 8 WSAs (90,887 acres) would be recommended as suitable for designation.	Diamond Breaks WSA (36,240) acres would be recommended as suitable for designation; the other 7 WSAs would be recommended as nonsuitable for designation.
Hells Canyon and Cross Mountain Canyon ACECs (1,480 acres), and Limestone Ridge, Ink Springs and Ace in the Hole RNAs (1,890 acres) would be designated.	Irish Canyon, Hells Canyon, Lookout Mountain, and Cross Mountain ACECs (19,380 acres), and Limestone Ridge, Ink Springs, Horse Draw, Vermillion Creek, Ace in the Hole, and Vermillion Bluffs RNAs (3,360 acres) would be designated.	Irish Canyon, Hells Canyon, Lookout Mountain, and Cross Mountain Canyon ACECs (19,380 acres); Limestone Ridge, Ink Springs, Horse Draw, Vermillion Creek, Ace in the Hole, Vermillion Bluffs, Calico Draw and G-Gap RNAs (4,285 acres); and Little Yampa Canyon DNA (12,000 acres) would be designated.	Irish Canyon, Lookout Mountain, and Cross Mountain Canyon ACECs (21,180 acres), and Limestone Ridge RNA (1,350 acres) would be designated.
Little Yampa/Juniper Canyon (21,000 acres) and Irish Canyon (25,000 acres) would be administered as special recreation management areas; the Diamond Breaks area (31,480 acres) would be managed to maintain primitive and semiprimitive-nonmotorized settings and opportunities.	Little Yampa Canyon (21,000 acres), Irish Canyon (15,000 acres), and Cedar Mountain (880 acres) would be administered as special recreation management areas; the Colorado portion of the West Cold Spring Area (14,482 acres), and the Ant Hills (4,354 acres), Chew Winter Camp (1,320 acres), Peterson Draw (5,160 acres), and Teepee Draw (5,490 acres) areas would be managed to maintain existing semi-primitive settings and opportunities.	Irish Canyon (15,000 acres) and Cedar Mountain (880 acres) would be administered as special recreation management areas.	Limited management would be provided in Irish Canyon ACEC; Little Yampa/Juniper Canyon (19,840 acres) and Cross Mountain (13,000 acres) would be administered as special recreation management areas. Manage Cedar Mountain (880 acres) and two areas on Cold Spring Mountain (27,600 acres) as recreation priority areas.
1,174,269 acres would be designated open, 78,280 acres limited (existing/ designated roads and trails, permitted uses), and 47,451 acres closed.	919,793 acres would be designated open, 274,160 acres limited (existing/ designated roads and trails, permitted uses), and 106,047 acres closed.	835,308 acres would be designated open, 343,160 acres limited (existing/ designated roads and trails, permitted uses), and 122,172 acres closed.	1,123,670 acres would be designated open, 127,440 acres limited (existing/ designated roads and trails, permitted uses), and 48,690 acres closed.

TABLE S-1 (Continued)

## SUMMARY OF PROPOSED MANAGEMENT ACTIONS BY ALTERNATIVE

Issues	All Alternatives	Current Management	Energy and Minerals
Cultural Resources	Surface-disturbing activities would be reviewed to identify and protect cultural resources; all identified resources would be managed commensurate with their values; if criteria were met, sites would be nominated to the National Register of Historic Places; general and site specific cultural resource management plans would be developed.	Same	Same
Paleontological Resources	Inventories would be conducted on a case-by-case basis as surface-disturbing activities are proposed.	Same	Same
Acquisition/Disposal Areas	The Resource Area would be divided into general retention and disposal areas; all forms of land tenure adjustment would be allowed on certain lands within the disposal area and all forms of land tenure adjustment, except sales, in the retention area would be allowed. Acquisitions would be pursued to meet resource management objectives.	All forms of land tenure adjustment would be allowed on 1,561 acres within the disposal area.	All forms of land tenure adjustment would be allowed on the 6,640 acres of public land within the disposal area.
Major Rights-of-Way	Proposed and existing right-of-way corridors would be identified as suitable or unsuitable for designation; communications facilities would be restricted to existing sites; minor rights-of-way would be processed on a case-by-case basis.	Applications would be processed on a case-by-case basis.	No corridors would be designated; 49,790 acres would be identified unsuitable for, and 250,915 acres sensitive to routing of major rights-of-way. The remainder of the Resource Area would be considered as open.
Access, Boundary Marking, and Road Requirements	None	Administrative access would be obtained for timber management and public access would be obtained for recreation.	Access would be pursued to first and second priority areas for recreation, followed by first priority areas for timber management.

Commodity Production	Renewable Resource	Natural Environment	Preferred Alternative
Same	Same	Same	Same
Same	Same	Resource would be systematically inventoried, classified, designated, and monitored.	Same as Natural Environment.
Same as Energy and Minerals.	Same as Energy and Minerals	Same as Energy and Minerals	Same as Energy and Minerals
No corridors would be designated; 61,971 acres would be identified unsuitable for, and 71,225 acres sensitive to routing of major rights-of-way. The remainder of the Resource Area would be considered as open.	No corridors would be designated; 106,241 acres would be identified unsuitable for, and 188,329 acres sensitive to routing of major rights-of-way. The remainder of the Resource Area would be considered as open.	Six corridors would be designated; 122,992 acres would be identified unsuitable for, and 298,780 acres sensitive to routing of major rights-of-way.	No corridors would be designated; 63,350 acres would be identified unsuitable for, and 97,465 acres sensitive to routing of major rights-of-way. The remainder of the Resource Area would be considered as open.
Same as Energy and Minerals	Access would be pursued to first priority areas for forest management, followed by first priority areas for recreation.	Access would be pursued to special management areas, followed by first priority areas for recreation.	Access would be pursued to first priority areas for recreation, followed by first priority areas for forest management and special management areas.

TABLE S-2

SUMMARY OF PROPOSED MANAGEMENT ACTIONS  
FOR PROPOSED PLAN

Issues	Proposed Plan
Coal	Approximately 638,800 acres (containing an estimated 5.6 billion tons) would be available for further consideration for leasing (approximately 457,100 acres for surface/underground; approximately 181,700 acres underground only).
Oil and Gas	1.04 million acres would be open to leasing with standard lease terms; 685,527 acres would be open with seasonal restrictions (critical) wildlife habitat); 18,180 acres would be open with avoidance stipulations (ACECs); 35,840 acres would be open with performance standards (fragile soils); 52,775 acres would be open with no surface occupancy (critical wildlife habitat; RIA; proposed wilderness; recreational area); 36,240 acres would be closed to leasing (proposed wilderness).
Other Mineral Development	Same, except that 50,321 acres would be closed to mineral entry (proposed wilderness).
Livestock Grazing	Use of full preference (166,895 AUs) would be authorized until completion of monitoring studies; livestock/wildlife conflicts would be resolved on a case-by-case basis; grazing level of 146,821 AUs would be baseline for monitoring. Land treatments would be implemented on 68 allotments; projects would be developed on 69 allotments; and management systems would be developed on all allotments.
Wildlife Habitat	Habitat would be provided on BLM lands to support 66,400 mule deer, 6,500 elk, 6,300 pronghorn, and 70 bighorn sheep contributing to total resource area populations of 110,600 mule deer, 21,700 elk, 8,350 pronghorn, and 70 bighorn sheep, until completion of monitoring studies; livestock/wildlife conflicts would be resolved on a case-by-case basis; and conflict area and critical habitats would be monitored. Riparian/aquatic activity plans would be developed; 3,000 acres of riparian and 400 acres of wetland habitat would be inventoried. Wildlife projects would be implemented.
Threatened/Endangered, Candidate, and Colorado BLM Sensitive Plants	Same as Preferred Alternative.
Wild Horses	Same as Current Management.

TABLE S-2 (cont'd)

SUMMARY OF PROPOSED MANAGEMENT ACTIONS  
FOR PROPOSED PLAN

Issues	Proposed Plan
Soil and Water Resources	Same as Preferred Alternative.
Forest Lands and Woodlands	Same as Preferred Alternative.
Fire Management	Same as Energy and Minerals.
Wilderness	Diamond Breaks (36,240 acres) and Cross Mountain (14,081 acres) WSAs would be recommended as suitable for designation; the other 6 WSAs would be recommended as unsuitable for designation.
Natural History	Same as Preferred Alternative
Recreation	Little Yampa/Juniper Canyon (15,840 acres) would be administered as a special recreation management area. Wild Mountain (21,000 acres), Cedar Mountain (880 acres), and two areas on Cold Spring Mountain (27,600 acres) would be managed as recreation priority areas.
Off-Road Vehicle Designations	598,000 acres would be designated open, 250,300 acres limited (existing/designated roads and trails, permitted uses), and 51,680 acres closed.
Cultural Resources	Same
Paleontological Resources	Same as Natural Environment.
Acquisition/Disposal Areas	All forms of land tenure adjustment would be allowed on the 6,670 acres of public land within the disposal area.
Major Rights-of-Way	No corridors would be designated; 63,350 acres would be identified unsuitable for, and 97,465 acres sensitive to routing of major rights-of-way. The remainder of the Resource Area would be considered as open.
Access, Boundary Marking, and Road Requirements	Access would be pursued to areas for recreation and timber management, as time and funding permit.

TAB. E S-3

SUMMARY OF IMPACTS BY ALTERNATIVE

Resource Element	Current Management	Energy and Minerals	Commodity Production
Air Quality	No significant impacts	No significant impacts	No significant impacts
Topography	No significant impacts	No significant impacts	No significant impacts
Coal	Sufficient coal would be available to meet demand. Lowest acreage available for consideration for leasing (172,000 acres: 131,200 surface & underground, 41,000 underground only). Potential bypass situations.	Sufficient coal would be available to meet demand. Largest acreage available for consideration for leasing (638,758 acres: 465,689 surface & underground, 173,069 underground only).	Sufficient coal would be available to meet demand. Largest acreage available for consideration for leasing (638,758 acres: 418,669 surface & underground, 220,089 underground only).
Oil and Gas	1.15 million acres would be open to leasing with standard lease terms; special stipulations would apply on 702,167 acres; no new leasing would be allowed on 27,424 acres.	1.10 million acres would be open to leasing with standard lease terms; special stipulations would apply on 741,897 acres; no new leasing would be allowed on 35,380 acres.	1.08 million acres would be open to leasing with standard lease terms; special stipulations would apply on 781,177 acres; no new leasing would be allowed on 14,081 acres.
Other Minerals	No significant impact	Minor impacts; low level of restrictions in general; closure to operation of mining laws (35,380 acres).	Minor impacts; low level of restrictions in general; closure to operation of mining laws (14,081 acres).
Vegetation	Expected long-term changes in ecological seral stages.	Expected long-term changes in ecological seral stages.	Expected long-term changes in ecological seral stages.
Climax	- 1%	+ 1%	+ 1%
High	- 5%	+ 3%	+ 5%
Medium	+ 3%	- 6%	- 9%
Low	+ 3%	+ 2%	+ 3%
Threatened/Endangered, Candidate and Sensitive Plants	No impacts to threatened or endangered plants; possible impacts to candidate and sensitive plants or habitat in areas where avoidance would be impossible.	Same impacts as Current Management, except additional protection to sensitive plants provided by designation of 3 ACECs and 3 RNAs (19,380 acres).	Same impacts as Current Management, except additional protection provided to sensitive plants by designation of 2 ACECs and 2 RNAs (3,110 acres).

Renewable Resource	Natural Environment	Preferred	Proposed Plan
No significant impacts.	No significant impacts.	No significant impact.	No significant impact.
No significant impacts.	No significant impacts.	No significant impact.	No significant impact.
Sufficient coal would be available to meet demand.	Sufficient coal would be available to meet demand.	Sufficient coal would be available to meet demand.	Sufficient coal would be available to meet demand.
Moderate acreage available for further consideration for leasing (367,120 acres: 245,982 surface and underground; 121,138 underground only). Potential bypass situations.	Moderate acreage available for consideration for leasing (344,880 acres: 225,250 surface & underground; 119,630 underground only). Potential bypass situations.	Largest acreage available for consideration for leasing (638,758 acres: 396,522 surface & underground; 242,236 acres underground only).	Largest acreage available for consideration for leasing (638,758 acres: 457,089 surface & underground; 181,669 acres underground only).
985,156 acres would be open to leasing with standard lease terms; special stipulations would apply on 836,303 acres; no new leasing would be allowed on 56,881 acres.	1 million acres would be open to leasing with standard lease terms; special stipulations would apply on 786,482 acres; no new leasing would be allowed on 90,887 acres.	1.05 million acres would be open to leasing with standard lease terms; special stipulations would apply on 791,157 acres; no new leasing would be allowed on 36,240 acres.	1.04 million acres would be open to leasing with standard lease terms; special stipulations would apply on 792,622 acres; no new leasing would be allowed on 36,240 acres.
Moderate impacts; moderate level of restrictions in general, closure to operation of mining laws (56,881 acres).	Highest potential impacts by closure of 90,887 acres of the area to the operation of mining law.	Moderate potential impacts; moderate level of restriction; closure of 39,240 acres to operation of mining law.	Moderate potential impacts; moderate level of restriction; closure of 50,321 acres to operation of mining law.
Expected long-term changes in ecological seral stages.	Expected long-term changes in ecological seral stages.	Expected long-term changes in ecological seral stages.	Same impacts as Preferred
+ 1%	0	0	
+ 3%	- 2%	+ 4%	
- 6%	+ 1%	- 3%	
+ 2%	+ 1%	- 1%	
Same impacts as Current Management, except additional protection provided to sensitive plants by designation of 3 ACECs and 4 RNAs (21,700 acres).	This alternative provides the maximum protection by requiring general inventories and surveys on all surface disturbing activities. Additional protection would be provided to sensitive plants by the designation of 4 ACECs and 4 RNAs (21,975 acres).	Same impacts as Current Management, except additional protection would be provided to sensitive plants by designation of 3 ACECs and 1 RNA (22,530 acres).	Same impacts as Preferred

TABLE S-3 (Cont'd)

## SUMMARY OF IMPACTS BY ALTERNATIVE

Resource Element	Current Management	Energy and Minerals	Commodity Production
Wetlands/Riparian	Areas that are in poor condition would not improve, and many other areas may decline in condition.	These habitats would be protected from impacts of energy and mineral development by existing laws and regulations. Lack of emphasis on wildlife habitat management, however, would result in degradation from livestock grazing, off-road vehicles, and other uses.	Lack of emphasis on wildlife habitat management and increases in livestock grazing and other uses would result in significant degradation of these habitats.
Livestock Management	Long-term forage availability would be 139,882 AUMs, which represents a long-term decrease of 10% from existing grazing preference (166,855 AUMs).	Long-term forage availability would be 166,810 AUMs, which represents a long-term increase of 19% when compared to existing grazing preference.	Long-term forage availability would be 210,701 AUMs, which represents a long-term increase of 27% when compared to existing grazing preference.
Wildlife Habitat	Wildlife habitat maintained on BLM lands to support long-term average of 63,400 mule deer, 6,700 elk, 6,300 pronghorn, and 70 bighorn sheep contributing to total resource area populations of 105,750 mule deer, 21,500 elk, 8,400 pronghorn, and 70 bighorn sheep. Long-term adverse impact to big game critical winter range is anticipated. Riparian areas would remain in poor condition.	Reductions in wildlife habitat on BLM lands would limit big game numbers to long-term average of 55,900 mule deer, 5,500 elk, 5,500 pronghorn, and 70 bighorn sheep, contributing to total resource area populations of 89,900 mule deer, 18,300 elk, 7,100 pronghorn, and 70 bighorn sheep. Non-game species diversity would be reduced.	Reductions in wildlife habitat on BLM lands would limit big game numbers to long-term average of 48,620 mule deer, 5,000 elk, 4,500 pronghorn, and 70 bighorn sheep contributing to total resource area populations of 82,700 mule deer, 16,800 elk, 6,600 pronghorn, and 70 bighorn sheep. Riparian habitat would be further adversely affected. Overall habitat diversity would decrease.
Wild Horses	160 wild horses No Change.	Same as Current Management	65 wild horses (-55%). This reflects a 55% reduction in the wild horse herds.



Renewable Resource	Natural Environment	Preferred	Proposed Plan
These habitats would be provided maximum protection and substantial management activities, which would result in significant improvement in condition and an overall increase in wildlife species and habitat diversity.	These habitats would improve, resulting in significant improvement in condition and an overall increase in both wildlife species and habitat diversity.	These habitats would be protected from impacts of energy and mineral development by existing laws and regulations. These habitats would improve, resulting in significant improvement in condition and an overall increase in both wildlife species and habitat diversity.	Same as Preferred.
Long-term forage availability would be 173,313 AUMs, which represents a long-term increase of 4% when compared to existing grazing preference.	Long-term forage availability would be 122,111 AUMs, which represents a long-term decrease of 27% from existing grazing preference.	Long-term forage availability would be 163,493 AUMs. If short-term adjustments are initiated and long-term management practices are developed, preference will be restored to within 2% of original stocking rates.	Same as Preferred.
Increases in wildlife habitat on BLM lands would support long-term big game numbers of 73,000 mule deer, 7,400 elk, 6,300 pronghorn, and 70 bighorn sheep contributing to total resource area populations of 121,600 mule deer, 24,700 elk, 8,350 pronghorn, and 70 bighorn sheep. Nongame wildlife species diversity would increase. Riparian and other high-value habitats would improve significantly.	Wildlife habitat on BLM lands would improve to support long-term average of 66,400 mule deer, 6,500 elk, 6,300 pronghorn, and 70 bighorn sheep contributing to total resource area populations of 110,600 mule deer, 21,700 elk, 8,350 pronghorn, and 70 bighorn sheep. Improvement in riparian and other habitat diversity would benefit nongame wildlife.	Wildlife habitat on BLM lands would support 61,000 mule deer, 5,700 elk, 5,600 pronghorn, and 70 bighorn sheep contributing to total resource area populations of 102,000 mule deer, 18,400 elk, 7,500 pronghorn, and 70 bighorn sheep. Localized short-term adverse impacts would occur. Cumulative management of soil, watershed, fire, wilderness, natural history, and ORV, designation would have overall beneficial impact to wildlife habitat.	Same as Preferred.
Same as Current Management.	470 wild horses (+310). This reflects a 293% increase in the wild horse herd.	Same as Current Management.	Same as Current Management.

TABLE S-3 (Cont'd)

## SUMMARY OF IMPACTS BY ALTERNATIVE

Resource Element	Current Management	Energy and Minerals	Commodity Production
Soils	An overall increase in soil loss from surface erosion and a long-term decline in soil productivity would result in a declining trend for soil resources.	Cumulative impacts from increased surface disturbing activity would result in greater soil and soil productivity losses. Overall, soil resources would continue to be adversely affected.	Same as Energy and Minerals Alternative.
Water Resources	Short- and long-term increases in sediment and salinity loads in local surface waters is anticipated. Local degradation or alteration of groundwater resources would probably occur. Cumulative impacts could alter groundwater quality on a regional basis.	Same as Current Management, plus the cumulative effect on the quality of Yampa and Colorado river water is expected to be greater than Current Management; thus, a high potential exists for salinity problems to develop in the Yampa River.	Same as Energy and Minerals Alternative.
Forestry	No significant impacts.	No significant impacts.	No significant impacts.
Wilderness	Wilderness resource values would be adversely impacted on 96,887 acres.	Wilderness resource values would be adversely impacted on 55,507 acres. Wilderness resource values would be preserved on 35,380 acres.	Wilderness resource values would be adversely impacted on 76,806 acres. Wilderness resource values would be preserved on 14,081 acres.
Natural History	Remnant plant associations, scenic quality, and paleontologic values on 44,837 acres could be damaged or lost.	Remnant plant associations and scenic quality on 26,810 acres would be protected on 3 ACECs and 4 RNAs. Remnant plant associations and scenic quality on 14,855 acres could be damaged or destroyed.	Remnant plant associations, paleontologic values, and scenic quality on 32,295 acres could be damaged or destroyed. Remnant plant associations and scenic quality would be protected on 3,370 acres (2 ACECs and 3 RNAs).

Renewable Resource	Natural Environment	Preferred	Proposed Plan
Although short-term soil losses would unavoidably continue due to surface disturbances, long-term losses would be minimized. Watershed rehabilitation projects would improve soil conditions in some areas.	Same as Renewable Resource Alternative.	Although short-term soil losses would unavoidably continue due to surface disturbances, long-term losses would be minimized. Watershed rehabilitation projects, focusing on salinity control and soil stabilization would improve soil conditions in some areas.	Same as Preferred.
Although short-term sediment or salinity increases would unavoidably continue due to surface disturbances, long-term increases should be minimized. Watershed rehabilitation projects would improve surface water quality on a local basis. The Upper Yampa River water quality is expected to be adversely affected, during low flows, over the long-term. Cumulative impacts of all local disturbances could impact groundwater quality on a regional basis.	Same as Renewable Resource Alternative.	Same as Renewable Resource Alternative.	Same as Renewable Resource Alternative.
No significant impacts.	No significant impacts.	No significant impacts.	No significant impacts.
Wilderness resource values would be adversely impacted on 34,006 acres. Wilderness resource values would be preserved on 56,881 acres.	Wilderness resource values would be preserved on 90,887 acres.	Wilderness resource values would be adversely impacted on 55,847 acres. Wilderness resource values would be preserved on 36,240 acres.	Wilderness resource values would be adversely impacted on 41,766 acres. Wilderness resource values would be preserved on 50,321 acres.
Remnant plant associations, paleontologic values and scenic quality on 12,925 acres could be damaged or destroyed. Remnant plant associations and scenic quality would be protected on 22,740 acres on 4 ACECs and 6 RNAs.	Remnant plant associations, paleontologic values, and scenic quality would be protected on 35,665 acres on 4 ACECs, 8 RNAs, and 1 ONA.	Remnant plant associations and paleontologic values on 13,835 acres could be damaged or destroyed. Remnant plant associations and scenic quality would be protected on 22,530 acres on 3 ACECs and 1 RNA.	Same as Preferred Alternative.

TABLE S-3

## SUMMARY OF IMPACTS BY ALTERNATIVE

Resource Element	Current Management	Energy and Minerals	Commodity Production
Recreation	All resource dependent opportunities would decrease. Nonmotorized settings would decrease by 6,290 acres. Primitive settings would be eliminated. Semiprimitive motorized settings would decrease by 113,160 acres. Rural and urbanized settings would increase by 112,550 and 33,900 acres.	All resource dependent opportunities would decrease. Nonmotorized settings would decrease by 26,950 acres. Semi-primitive-motorized setting would decrease by 361,550 acres. Rural and urbanized settings would increase by 351,830 and 111,460 acres.	All resource dependent opportunities would decrease. Nonmotorized settings would decrease by 19,905 acres. Semiprimitive-motorized settings would decrease by 251,830 acres. Rural and urbanized settings would increase by 206,841 and 67,510 acres.
Cultural Resources	Minimum legal requirements would be met. The Open ORV designation could adversely impact 36,039 cultural sites.	Same as Current Management, except the Open ORV designation could adversely impact 26,311 cultural sites.	Same as Current Management except the Open ORV designation could adversely impact 31,208 cultural sites.
Paleontology	No significant impacts.	No significant impacts.	No significant impacts.
Land Status/Realty Actions	Significant impacts to manageability of Cedar Mountain communication site via off-road vehicle closure. Minimization of ability to adjust ownership pattern.	Minor adverse impacts to landownership adjustment program by restricting to nonmineral areas.	Same as Energy and Minerals Alternative.
Access/Transport	No significant impacts.	No significant impacts.	No significant impacts.
Economics	There would be an adequate supply of existing and future mineral leases to meet increases in market demand. No significant economic impacts.	Same as Current Management Alternative.	Same as Current Management Alternative.
Social Values	No significant social impacts.	No significant social impacts.	No significant social impacts.

Renewable Resource	Natural Environment	Preferred	Proposed Plan
All resource dependent opportunities would decrease. Nonmotorized settings would decrease by 5,760 acres. Semi-primitive-motorized settings would decrease by 147,122 acres. Rural and urbanized settings would increase by 148,381 and 41,310 acres.	Most resource dependent opportunities would decrease. Nonmotorized settings would decrease by 4,020 acres. Semi-primitive-motorized settings would decrease by 154,780 acres. Rural and urbanized settings would increase by 145,300 and 27,870 acres.	All resource dependent opportunities would decrease. Nonmotorized settings would decrease by 19,590 acres. Semi-primitive-motorized settings would decrease by 277,163 acres. Rural and urbanized settings would increase by 270,355 and 59,070 acres.	Same as Preferred Alternative.
Same as Current Management, except the Open ORV designation could adversely impact 24,438 cultural sites.	Same as Current Management, except the Open ORV designation could adversely impact 21,871 cultural sites.	Same as Current Management, except the Open ORV designation could adversely impact 29,415 cultural sites.	Same as Current Management, except the Open ORV designation could adversely impact 26,503 cultural sites.
No significant impacts.	No significant impacts.	No significant impacts.	No significant impacts.
Moderate adverse impacts due to soil related restrictions. Beneficial impacts to land adjustment program due to lack of overall restrictions.	Same as Renewable Resource Alternative.	Same as Renewable Resource Alternative.	Same as Renewable Resource Alternative.
No significant impacts.	No significant impacts.	No significant impacts.	No significant impacts.
Same as Current Management Alternative.	Same as Current Management Alternative.	Same as Current Management Alternative.	Same as Current Management Alternative.
No significant social impacts.	No significant social impacts.	No significant social impacts.	No significant social impacts.

**Proposed Little Snake  
Resource Management Plan**

# PROPOSED RESOURCE MANAGEMENT PLAN

This section describes the proposed resource management plan for the Little Snake Resource Area, in terms of (1) proposed management actions by resource and (2) definitions of proposed management priority areas, which are geographic areas that are unique, significant, or unusually suited for development, management, protection, or use of a particular resource. Management priority areas are delineated on the map of the proposed plan included with this document. The map visually summarizes the multiple-use decisions in the proposed plan and should be used in conjunction with the following narrative.

The management priority areas depicted on the proposed plan map may include areas of split-estate (private surface over federal minerals), private, state, or other nonfederal lands. However, the management priority areas apply only to public lands, i.e., BLM-managed surface and federal mineral estate. On split-estate lands, management priority area designations indicate how BLM would manage the federal mineral estate; they would not dictate other surface uses unrelated to federal mineral development. None of the management priority areas apply to private, state or other lands or minerals not managed by BLM.

In developing the proposed plan, BLM considered a balance of land uses and resource values within the resource area, the principles of multiple use and sustained yield, the issues and concerns raised by the public during development of the Draft RMP/EIS, the long-term public interest and benefits of implementing each of the alternatives analyzed in the Draft RMP/EIS, the environmental consequences of those alternatives, and public comments received on the Draft RMP/EIS. The proposed plan has been developed in accordance with the Federal Land Policy and Management Act of 1976; the National Environmental Policy Act of 1969; and other applicable laws, regulations, and standards.

The proposed plan recognizes the existence of valid existing rights. Nothing in the management actions or management priority area definitions is intended to challenge those rights.

Activities or uses not specifically addressed in the plan, such as small-scale projects (right-of-way applications for rural telephone lines, access roads, free-use permits, etc.), would be authorized if they met legal requirements and were compatible with the management emphasis of a given area.

Implementation of the recommended actions for the resource area would be guided by a series of activity plans. An activity plan is a more detailed and specific plan for management of a single resource program or plan element undertaken as necessary to implement the more general RMP decisions. Detailed management actions, including projects,

treatments, and other on-the-ground activities, and schedules, are described in the activity plan. Activity plans prepared following the RMP would include an oil and gas activity plan, habitat management plans (HMPs) for wildlife, allotment management plans (AMPs) for livestock grazing, landownership adjustment activity plans, watershed plans, and cultural resource management plans (CRMPs). Site-specific management plans would also be required for areas of critical environmental concern (ACECs), research natural areas (RNAs), special recreation management areas (SRMAs), and areas designated by Congress as wilderness.

In addition, an overall resource monitoring plan would be prepared for the Little Snake Resource Area. The plan would identify appropriate locations and methods for monitoring resources (either in combination or individually), coordination procedures for developing and initiating specific monitoring studies, and methods for recording and evaluating monitoring data.

## MANAGEMENT ACTIONS

### Coal (Issue 1-1)

1. Approximately 638,800 acres (containing an estimated 5.8 billion tons of coal) would be identified as acceptable for further consideration for federal coal leasing. Of this total, approximately 457,089 acres (an estimated 4.2 billion tons of coal) would be acceptable for further consideration for leasing for surface or underground development and approximately 181,669 acres (an estimated 1.3 billion tons of coal) would be acceptable for further consideration for leasing for underground development only (see Tables 1 and 2). Approximately 266 million tons of coal throughout the region would not be available for surface mining.
2. Site-specific activity planning, including additional environmental analysis, would be needed before a decision to lease specific tracts could be made.
3. Exploratory drilling would be allowed in order to obtain sufficient data for resource management decisions and fair-market-value determinations.
4. Other data gathering efforts would be scheduled that would ensure data adequacy standards would be met for activity planning within the coal planning area.

**TABLE 1**  
**SUMMARY OF COAL UNSUITABILITY RESULTS\***

Criterion	Acres		
	Before Exceptions	After Exceptions	After <sup>1</sup> Exemptions
1 Federal lands systems	322	322	322
2 Rights-of-way and easements	3,041	0	0
3 Buffer zones along rights-of-way and adjacent to communities and buildings	3,151	1,486	1,486
4 Wilderness study areas	0	0	0
5 Scenic areas	0	0	0
6 Lands used for scientific studies	0	0	0
7 Historic lands and sites	0	0	0
8 Natural areas	0	0	0
9 Federally listed endangered species	7,541	7,541	7,541
10 State listed endangered species	0	0	0
11 Bald and golden eagle nests	48,207	45,898	45,898
12 Bald and golden eagle roost and concentration areas	7,541 <sup>2</sup>	7,541 <sup>2</sup>	7,541 <sup>2</sup>
13 Falcon cliff nesting site	2,402	2,402	2,402
14 Migratory birds	2,681	2,681	2,681
15 State resident fish and wildlife	611,878 <sup>3</sup>	37,960	37,960
16 Floodplains	5,104	5,104	5,104
17 Municipal watersheds	0	0	0
18 National resource waters	0	0	0
19 Alluvial valley floors	1,948 <sup>4</sup>	1,948 <sup>4</sup>	1,948 <sup>4</sup>
20 State proposed criterion	0	0	0
Total lands unsuitable (excluding overlaps)	611,878	104,261	104,261

\* This table is a summary of application of the 20 coal unsuitability criteria from 43 CFR 3461 to the federal coal planning area. See Appendix 2, Federal Lands Review, in the Draft RMP/EIS for more detailed information.

<sup>1</sup> The unsuitability criteria are subject to exemptions and/or specific exceptions. General exemptions applicable to several criteria include: lands subject to valid existing rights (Criteria Numbers 1, 3, 4 [limited]); lands to which the operator has made substantial legal and financial commitments prior to January 4, 1977 (all except Criteria Numbers 3, 4, and 19); surface coal mining operations existing on August 3, 1977 (all except Criteria Numbers 4 and 7); and lands for which a mining permit has been issued (all but 3, 4, and 7). All criteria except 4, 5, 6, 15, 16, and 19 are also subject to one or more specific exceptions. For example, the exceptions to Criterion Number 11 state that a lease may be issued if stipulations can ensure that eagles are not disturbed during the breeding season, or if the Fish and Wildlife Service determines that the nest(s) of golden eagles can be moved; and the size of a buffer zone can be decreased if active eagle nests will not be adversely affected. Results did not change after the exemptions were considered because the criteria were not applied to leased lands (43 CFR 3461.4-2), and none of the exemptions were applicable to the unleased lands in the coal planning area.

<sup>2</sup> These lands are the same as identified in Criterion 9.

<sup>3</sup> Overlaps with all other criteria.

<sup>4</sup> Includes 1,081-acre overlap with Criterion 16.



## PROPOSED RESOURCE MANAGEMENT PLAN

**TABLE 2**  
**ACRES AVAILABLE FOR FURTHER**  
**CONSIDERATION FOR COAL LEASING**  
(excluding overlaps)\*

Screens	Results
Coal Development Potential	638,758
Unsuitability Review	(-104,261)
Acreage Remaining	534,497
Surface Owner Consultation	(-68,808)
Acreage Remaining	465,689
Multiple Use Tradeoffs	
Recreation	(-8,600)
Acreage Remaining	457,089
Total Acres Available	
Surface/Underground Methods	457,089
Total Acres Available	
Underground Methods Only	181,669
(No Surface Disturbance)	
Total Coal Tonnage Available	5.5 billion

\* In some portions of the coal planning area, more than one screen was found to apply; e.g., portions of the Little Yampa Canyon SRMA were eliminated as the result of both unsuitability criteria and multiple-use tradeoffs. Acreage for such areas was only subtracted once from the total coal planning area acreage.

oil and gas development will be allowed on lands open to leasing. This activity plan will assess the levels of direct, indirect, and cumulative impacts resulting from a reasonable, foreseeable level of oil and gas development in the resource area. The activity plan will, in part, identify any additional necessary and justifiable mitigative measures to reduce or eliminate unacceptable adverse environmental impacts, as well as those less restrictive methodologies that would result in the same desired effect. The plan will also identify any change to oil and gas leasing decisions made in the Little Snake RMP that may be warranted.

At a minimum, the oil and gas activity plan will address the primary, secondary, and cumulative impacts of at least one reasonable, foreseeable level of oil and gas development in the Little Snake Resource Area. The level of development will be based on resource potential (see the enclosed oil and gas map) and historical oil and gas activity in the area. The analysis of impacts will be based on assumptions, such as the number of wells expected to be drilled in the resource area over the 20-year life of the Little Snake RMP, the varying density of those wells, typical surface disturbance in acres resulting from oil and gas activity, reclamation potential, the number of acres in a disturbed condition in a typical year, and the total number of acres disturbed during the 20-year period of the Little Snake RMP.

Until this activity plan is approved, the Little Snake oil and gas umbrella EA will continue to be the National Environmental Policy Act compliance document for oil and gas leasing in the resource area. The oil and gas activity plan should be completed by early 1987.

### Oil and Gas (Issue 1-2)

1. The resource area would generally be available for oil and gas leasing. Areas have been designated for leasing with standard stipulations, seasonal restrictions, avoidance stipulations, performance objectives, or no-surface-occupancy stipulations; areas where no new leasing would be allowed have also been identified (see Table 3). Stipulations or restrictions may be waived or reduced in scope if circumstances change, or if the lessee can demonstrate that operations can be conducted without causing unacceptable impacts to the concern(s) identified. The appropriateness of allowing specific stipulations to be waived will be further analyzed in the oil and gas activity plan discussed in Item 2 below.
2. After completion of the Little Snake RMP, an oil and gas activity plan will be developed for the Little Snake Resource Area to further refine the degree to which

### Other Minerals (Issue 1-3)

1. All public land would be open to locatable mineral entry and development unless withdrawn (administrative withdrawals) or proposed for withdrawal (proposed wilderness designation). Mineral exploration and development on public land would be regulated under 43 CFR 3800.
2. Applications for removing common variety mineral materials, including sand and gravel, would continue to be processed on a case-by-case basis. Stipulations to protect important surface values would be attached, based on interdisciplinary review of each proposal. Mineral material sales would not be allowed in Limestone Ridge ACEC/RNA, Little Yampa/Juniper Canyon SRMA, and the Cedar Mountain recreation management priority area.

**TABLE 3**  
**OIL AND GAS LEASING RESTRICTION RECOMMENDATIONS**

<b>Proposed Restrictions</b>	<b>Estimated Acreage</b>	<b>Percentage of Federal Oil and Gas Acreage (1,878,400 acres)</b>	<b>Area<sup>1</sup></b>
Seasonal Restrictions	685,927	36	Critical wildlife habitat (scattered throughout the resource area) <sup>2</sup>
Avoidance Stipulations <sup>3</sup>	11,680 6,500		Irish Canyon ACEC Lookout Mountain ACEC
Subtotal	18,180	1	
Performance Standards <sup>4</sup>	35,840	2	Portions of Canyon Creek, Shell Creek, Vermillion Creek, Sand Wash, Dry Creek, Yellow Cat Wash, northwest facing slopes Vermillion Bluffs (extremely fragile soils/water areas)
No Surface Occupancy	16,240		Critical wildlife habitat (scattered throughout the resource area) <sup>5</sup>
	1,350 14,081		Limestone Ridge ACEC/RNA Cross Mountain WSA, including Cross Mountain Canyon ACEC (recommended for wilderness designation)
	19,840 880 384		Little Yampa/Juniper Canyon SRMA Cedar Mountain recreation area Steamboat Lake State Park
Subtotal	52,775	3	
No New Leasing	36,240	2	Diamond Breaks WSA (recommended for wilderness designation)
Standard Lease Terms	1,049,438	56	Remaining federal oil and gas acreage

<sup>1</sup> ACEC Area of Critical Environmental Concern  
RNA Research Natural Area  
SRMA Special Recreation Management Area  
WSA Wilderness Study Area

<sup>2</sup> See Table 4 under Wildlife Habitat (Issue 2-2) for a summary of seasonal wildlife restrictions. Seasonal restrictions do not apply to maintenance and operation of producing wells. Exceptions to seasonal limitations in any particular year may be specifically approved in writing by the authorized officer.

<sup>3</sup> See the Special Designations section under Management Priority Areas for examples of avoidance stipulations. Additional scattered areas containing habitats of known Colorado BLM sensitive plants and specifically identified remnant plant associations would also be protected by avoidance stipulations.

<sup>4</sup> If performance standards could not be met, then surface occupancy would not be allowed. Additional areas within the resource area may have restrictive stipulations imposed on a case-by-case basis to protect fragile soils and water resource values; see Soils and Water Resources (Issues 2-5 and 2-6) for further discussion.

<sup>5</sup> Critical raptor habitat, greater sandhill crane habitat, critical wildlife watering areas, beaver colonies, sage grouse strutting grounds, sharptailed grouse dancing grounds, prairie dog towns (potential black-footed ferret habitat). See Item 3 under Wildlife Habitat (Issue 2-2).

3. BLM would consider leasing geothermal energy resources or other leasable minerals on a case-by-case basis. All minerals that are considered leasable on acquired lands (Bankhead-Jones Land Use Lands) would be treated the same as other leasable minerals. In Limestone Ridge ACEC/RNA, Little Yampa/Juniper Canyon SRMA, and the Cedar Mountain recreation management priority area, leasing of other minerals for underground mining would be allowed with no-surface-occupancy stipulations. Leasing for surface mining would not be allowed in these three areas.
4. New leases and mineral material sales within fragile soil and water areas would be subject to the performance objectives described under Soil and Water Resources (Issues 2-5 and 2-6).
5. The recommended Diamond Breaks and Cross Mountain wilderness areas (including Cross Mountain Canyon ACEC) would be withdrawn from locatable mineral entry, leasing and development of other minerals, and mineral material sales.

### **Livestock Grazing (Issue 2-1)**

1. Livestock grazing utilizing federal preference (166,895 AUMs) would be allowed until rangeland monitoring studies were completed.
2. BLM would immediately initiate rangeland monitoring studies on a minimum of 13 conflict allotments (allotment numbers 4203, 4206, 4207, 4209, 4210, 4219, 4225, 4302, 4431, 4432, 4520, 4521, and 4522) to yield information needed to make management decisions on livestock stocking rates. Other rangeland monitoring studies would be initiated on allotments exhibiting worst-forage conditions established from the 1981-83 surveys. The level of survey would depend on funding and staff.
3. Based on 1981-1983 surveys for 73 percent of the area and earlier surveys for the rest of the area, anticipated grazing level of 148,821 AUMs would be used as baseline inventory data.
4. Livestock-use adjustments would be implemented in accordance with 43 CFR 4110.3-3 after acquisition of 2 or 3 years of rangeland monitoring data, in combination with baseline data, if such data indicated that adjustments were necessary. Decisions implementing changes in livestock use would be issued as soon as data were available to support that change. In no case would more than 5 years of rangeland monitoring data be required for adjustments. Any adjustments

### **PROPOSED RESOURCE MANAGEMENT PLAN**

- would result in consultation/coordination with the livestock operator.
5. A 5-year implementation period would be used. Decisions would be issued in the third and fifth years to modify the adjustments as necessary to reach estimated grazing capacity. These decisions would be contained in a rangeland program summary.
6. Livestock grazing would be temporarily suspended in areas where key forage plants have been critically overutilized.
7. Vegetative land treatments would be implemented on 68 allotments. Proposed treatments would involve interseeding, burning, burning and reseeding, spraying, and plowing and reseeding; in conducting these treatments, BLM would adhere to established procedures and design specifications to protect all resource uses and values. A benefit/cost analysis and environmental analysis would be completed before any treatments were implemented.
8. Range improvement projects would be constructed on 69 allotments to control livestock use, improve distribution, and improve riparian/wetland habitat. A benefit/cost analysis and environmental analysis would be completed before any projects were implemented.
9. Management categorization (M, I, or C) for allotments would be updated as the result of rangeland condition change or as data that supported changes became available through the monitoring program.
10. Allotment management plans would be developed for all allotments within the Little Snake Resource Area. Level of detail of each plan would be determined from the management category (M, I, or C) for that allotment.

### **Wildlife Habitat (Issue 2-2)**

1. Forage would be provided on BLM land to maintain approximately 66,400 mule deer, 6,500 elk, 6,300 pronghorn, and 70 bighorn sheep, which would contribute to total resource area big game populations of 110,600 mule deer, 21,700 elk, 8,350 pronghorn, and 70 bighorn sheep, until further monitoring studies were completed and proper utilization levels were established.
2. BLM would immediately initiate monitoring studies on a minimum of 13 conflict allotments (allotment numbers 4203, 4206, 4207, 4209, 4210, 4219, 4225, 4302, 4431, 4432, 4520, 4521, and 4522) to yield information needed to make management decisions on wildlife numbers. Other monitoring studies would be initiated on allotments exhibiting worst-forage

## PROPOSED RESOURCE MANAGEMENT PLAN

conditions, as established from the 1981-83 surveys. The level of survey would depend on funding and personnel.

3. Wildlife-use adjustments would be implemented through consultation and coordination with CDOW, if monitoring data indicated that adjustments were necessary. Negotiation to implement changes in wildlife use would proceed as soon as data were available to support that change. In no case, would more than 5 years of rangeland monitoring be required for adjustments.
4. Wildlife habitat would be maintained or improved through application of mitigative measures or restrictions applied to all wildlife habitat-disturbing activities.
5. Wildlife habitat would be maintained or improved through application of seasonal restrictions on resource activities to maintain wildlife production areas and important wildlife habitat (Table 4).

**TABLE 4**

### WILDLIFE SEASONAL RESTRICTIONS TO RESOURCE DEVELOPMENT ACTIVITIES

Type of Area Restricted	Dates Activity Allowed
Greater sandhill crane nesting and staging area buffer zones	Oct. 15 - Feb. 28
Sage grouse strutting ground buffer zone	June 1 - Feb. 28
Critical raptor nest buffer zones	Aug. 1 - Jan. 31
Bald eagle habitat	April 15 - Oct. 31
Sharptail grouse dance ground buffer zone	June 15 - March 15
Mule deer and elk migration routes	May 15 - Oct. 15 and Dec. 1 - March 15
Mule deer, bighorn sheep, pronghorn antelope, mountain lion, elk critical winter range	April 15 - Nov. 30
Elk calving	July 1 - April 15
Pronghorn antelope fawning, bighorn sheep lambing	July 1 - April 30

6. Wildlife habitat for raptors, the greater sandhill crane, wildlife watering areas, beaver colonies, sage-grouse strutting grounds, and potential black-footed ferret habitat (some prairie-dog towns) would have no surface-occupancy stipulations applied to new oil and gas leases. These areas vary in size between 10 and

640 acres and are scattered throughout the resource area; current known total habitat is 16,240 acres. Such stipulations would also be applied to similar habitat identified in future surveys.

7. Activity would not be permitted in threatened, endangered, and sensitive species' habitat that would jeopardize their continued existence. The CDOW and the U.S. Fish and Wildlife Service (USFWS) would be consulted pursuant to Section 7 of the Endangered Species Act before implementation of projects that might affect threatened and endangered species' habitat.
8. BLM would cooperate with the Colorado Division of Wildlife in monitoring the habitat and populations of bighorn sheep on Cross Mountain and in the Cold Spring Mountain area.
9. BLM would coordinate with the Colorado Division of Wildlife for joint funding of wildlife projects.
10. The federally endangered American peregrine falcon, Colorado squawfish, humpback chub, bonytail chub, and the state protected razorback sucker would be protected by designation of Cross Mountain Canyon ACEC (see proposed plan map).
11. Wildlife habitat management plans would be prepared and implemented, emphasizing aquatic/riparian habitats for priority areas, for the Little Snake River, Yampa River, Vermillion Creek, Beaver Creek, Canyon Creek, Dry Creek, Shell Creek, Morgan Gulch, Milk Creek, Fortification Creek, West Timberlake Creek, Willow Creek, and Fourmile Creek.
12. Aquatic surveys would be completed on 3,000 acres of riparian and 400 acres of known wetland wildlife habitat.
13. Inventories would be conducted to determine if other riparian or wetland habitats occur in the resource area and to determine their wildlife value as wildlife habitat.
14. Wildlife watering guzzlers would be installed on Godiva Rim, Sand Wash Basin, Cross Mountain, and Dry Mountain. Additional environmental analyses would be completed and design specifications would be adhered to before any wildlife habitat improvement project would be implemented.
15. Sage grouse and elk habitat would be improved on West Cold Spring Mountain by rollerchopping or burning irregular-shaped areas (maximum size 100 acres) of sagebrush.
16. Elk habitat would be improved in Bald Mountain Basin and Great Divide by conducting prescribed burns within irregular-shaped areas (maximum size 300 acres).

17. Antelope distribution in Sand Wash, Powder Wash, and Great Divide would be improved by constructing 25 antelope passes, installing 2 miles of lay-down panels, and constructing fence modifications.
18. Elk habitat on Dry Mountain would be improved by chaining or burning irregular-shaped plots (varying in size from 5 to 50 acres) of juniper.
19. An undetermined number of springs and seeps, and associated wetlands and riparian areas, would be fenced to protect the water source and associated riparian habitat. Water would be transported outside the fenced area for other uses.

### **Threatened/Endangered, Candidate, and Sensitive Plants (Issue 2-3)**

1. Proposed project locations likely to harbor threatened/endangered, candidate, and Colorado BLM sensitive plants would be surveyed before project development. Section 7 of the Threatened and Endangered Species Act of 1973 consultation procedures with the USFWS will be implemented when a "may-affect" determination is made for listed threatened and endangered species.
2. Identified threatened, endangered, and candidate species would be protected through no-surface-occupancy stipulations.
3. Identified Colorado BLM sensitive plants would be protected through avoidance stipulations. The avoidance stipulation, when applied, would incorporate wording to the effect that "habitat of known populations of Colorado sensitive plants, and those remnant vegetation associations specifically identified, would be protected from human-induced activities whenever possible." For Colorado BLM sensitive plants, the area of protection would include the actual location of the population and, if present, adjacent critical sites that affect their habitat.
4. Colorado BLM sensitive plants would be protected by designation of Limestone Ridge ACEC/RNA, Cross Mountain Canyon ACEC, Irish Canyon ACEC, and Lookout Mountain ACEC (see proposed plan map).

### **Wild Horses (Issue 2-4)**

1. Habitat condition in Sand Wash Basin would be managed to maintain the current herd at between 130 to 160 wild horses.

## **PROPOSED RESOURCE MANAGEMENT PLAN**

2. Surplus horses would be gathered to bring the herd numbers to proper management levels, based on annual counts.
3. A monitoring program would be established that would determine annual utilization and vegetative trends within the Sand Wash Basin.

### **Soil and Water Resources (Issues 2-5 and 2-6)**

1. Soil and water resources would be protected through mitigation or restrictions applied to surface- and underground-disturbing activities, as needed, on a case-by-case basis. Water quality parameters would conform to state water quality standards.
2. The fragile soil and water areas identified in a-g below (and shown on the map of the proposed plan) are areas where soil erosion is a concern. In these areas, BLM has the following performance objectives.
  - a. Maintain the soil productivity of the site by reducing soil loss from erosion and through proper handling of the soil material.
  - b. Reduce impact to off-site areas by controlling erosion and/or overland flow from these areas.
  - c. Protect water quality and quantity of adjacent surface and groundwater sources.
  - d. Reduce accelerated erosion caused by surface disturbing activities.
  - e. Select the best possible site in order to reduce the impacts to the soil and water resources.

These performance objectives would be attached as stipulations at the time of lease issuance. If these performance objectives cannot be met, surface occupancy will not be permitted on federal surface. On private surface (federal mineral areas) BLM will (if necessary) work with the private surface owner to come to an acceptable surface-use program where the impact of development of federal minerals may extend off lease and affect adjacent federal lands or resources. If such impacts are contained entirely on lease, BLM will let the surface owner know the concerns relating to development on fragile soils, but the surface owner's desires regarding development and reclamation will be primary.

All other proposed surface-disturbing activities within areas a-g below would undergo a site-specific review at the resource area and/or district level. Special performance objectives (listed in I-IX) would be applied to these activities as well. Again, if the performance objectives could not be met, surface occupancy would

## PROPOSED RESOURCE MANAGEMENT PLAN

not be authorized. The areas listed in a-g encompass approximately 2 to 3 percent of the total acreage within the resource area.

- a. The area along Canyon Creek, including the adjacent steep side slopes, to approximately 1/2 mile either side of the creek. The actual boundary would be drawn based on topography.
- b. The area along Shell Creek, including the adjacent steep side slopes, to approximately 1/2 mile either side of the creek. The actual boundary would be drawn based on topography.
- c. The area along Vermillion Creek, including the adjacent steep side slopes, to approximately 1/2 mile to either side of the creek (the actual boundary being based on topography), downstream to the confluence with Douglas Draw.
- d. The area along Sand Wash, including the adjacent side slopes, to approximately 1/2 mile either side of the wash (the actual boundary to be drawn based on topography), from section 10, T. 9 N., R. 99 W., to its confluence with Dugout Draw.
- e. The area along Yellow Cat Wash, including the adjacent side slopes, to approximately 1/2 mile either side of the wash (the actual boundary being based on topography), from section 12, T. 9 N., R. 98 W., to its confluence with Sand Wash.
- f. The area along Dry Creek, including the adjacent side slopes, to approximately 1/2 mile either side of the creek (the actual boundary to be based on topography), from section 22, T. 11 N., R. 99 W., to its confluence with Vermillion Creek.
- g. The northwest facing slopes of the Vermillion Bluffs, from the Vermillion Bluffs ridgetop road downslope to the Dry Creek drainage.

To achieve the performance objectives, BLM has identified performance standards that may apply to surface disturbing activities. These standards are presented to identify the types of mitigative measures that may be necessary, based on the type of activity to be permitted, the timing of development activities, the geographical location, specific soil types and conditions, etc. Depending on these variables, an applicant will demonstrate that the performance objectives have been met either through his/her plan of development, using alternative measures, or through use of appropriate suggested mitigative measures identified below.

- I. All sediments generated from the surface-disturbing activity would have to be retained on site.

II. No construction or other surface-disturbing activities would be allowed when the soils become saturated to a depth of 3 inches or more.

III. Off-road vehicle use would be limited to existing roads and trails.

IV. All new permanent roads would be built to meet primary road standards (BLM standards) and their location approved by the authorized officer. For oil and gas purposes, permanent roads are those used for production.

V. All geophysical and geochemical exploration would be conducted by helicopter, horseback, on foot, or from existing roads.

VI. Any sediment control structures, reserve pits, or disposal pits would be designed to contain a 100-year, 6-hour storm event. Storage volumes within these structures would have a design life of 25 years.

VII. Before reserve pits and production pits would be reclaimed, all residue would be removed and trucked off-site to an approved disposal site.

VIII. Reclamation of disturbed surfaces would be initiated before November 1 each year.

IX. All reclamation plans would be approved by the authorized officer in advance and might require a bond, if one has not been previously posted.

These requirements would not supersede valid existing rights on approved application for permits to drill or developing leases or entry under the general mining laws. They would apply to all new oil and gas leases and to all surface disturbing activities permitted under this plan. BLM will work with operators/permittees to achieve performance objectives on undeveloped leases or permits consistent with previously granted lease rights.

3. Rights-of-way construction would be allowed along Moffat County roads 4, 67, and 126 on a case-by-case basis. Stipulations would be applied to the right-of-way activity at the approval stage.
4. Surface-disturbing activities on isolated sites that meet fragile soil criteria (a-b below) would be subject to the performance objectives/stipulations listed in I-IX above. If the performance objectives/stipulations could not be met, no surface disturbance would be allowed.
  - a. Areas rated as highly or severely erodible by wind or water, as described by the Soil Conservation Service in the Area Soil Survey Report or as described by on-site inspection.
  - b. Areas with slopes greater than or equal to 35 percent, if they also have one of the following soil characteristics: (1) a surface texture that is sand, loamy sand,

very fine sandy loam, fine sandy loam, silty clay, or clay; (2) a depth to bedrock that is less than 20 inches; (3) an erosion condition that is rated as poor; or (4) a K factor (see Glossary in Draft RMP/EIS) of greater than .32. (See Table 5.)

5. Range and water projects would be developed and implemented in order to encourage the relocation of livestock from within fragile soil and water areas. Where necessary, livestock would be fenced from riparian areas, although a water source would be provided.
6. No-surface-occupancy stipulations would be established through the activity planning process in areas adjacent to perennial water sources. (Stipulations would apply from within 500 feet to 1/4 mile of the water source, depending on the type of source, use of source, soil type, and slope steepness.)
7. Construction would be allowed within or near intermittent drainages and their floodplains only after completing a case-by-case analysis of soil type and slope steepness of the drainage. Compliance with Executive Order 11988 would be ensured. These actions would not preclude road crossings built to BLM specifications.
8. To ensure that unstable areas were avoided, accelerated erosion was reduced, and detailed soil information was made available, detailed soil surveys would be conducted on timber harvesting areas of Diamond Peak/Middle Mountain and Douglas Mountain.
9. The remaining 10 percent of the water quality and quantity inventory of resource area springs and seeps would be completed.

**TABLE 5**  
**POTENTIAL FRAGILE SOILS WITHIN**  
**SOIL/WATER**  
**MANAGEMENT PRIORITY AREAS**

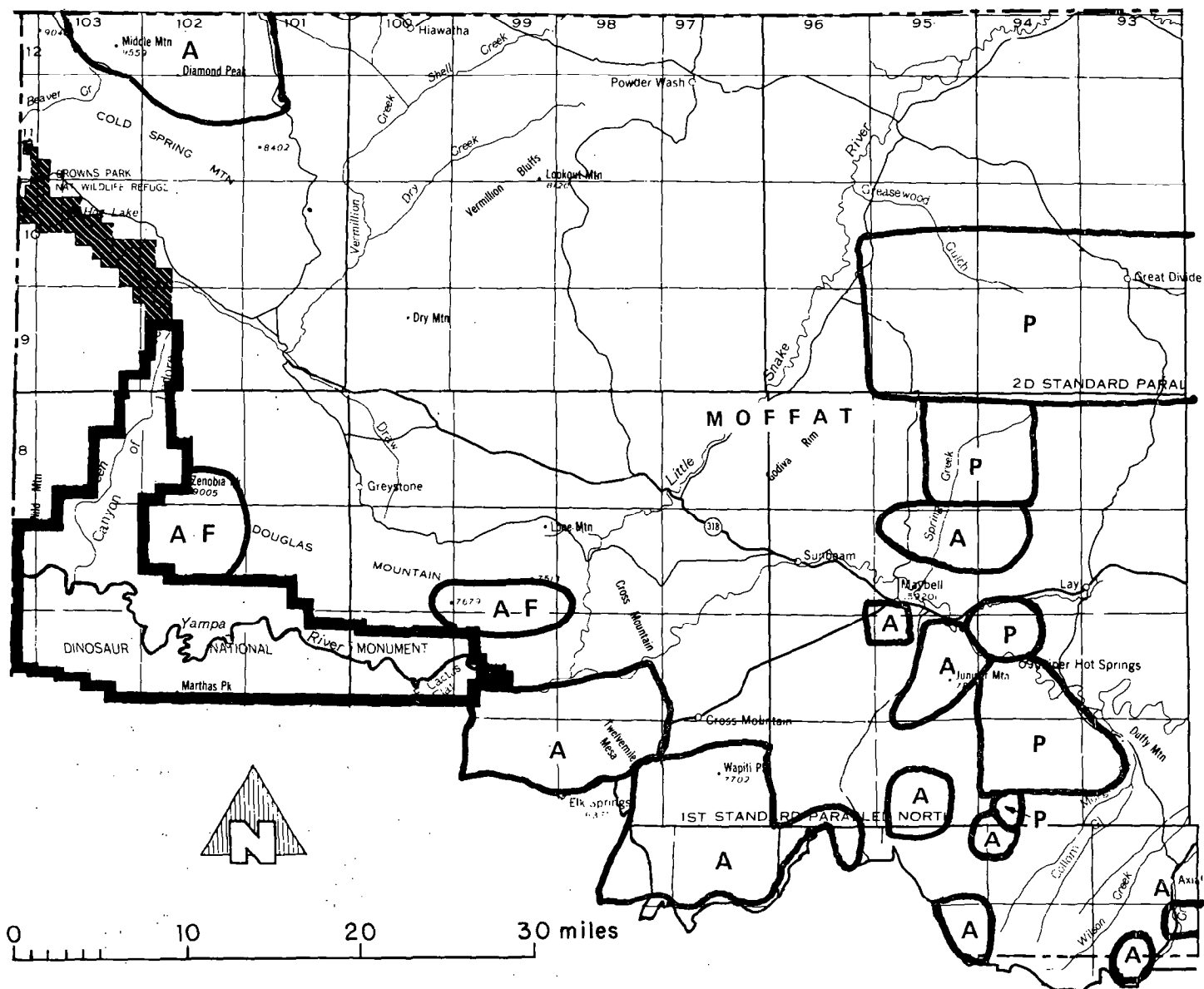
Area	Estimated Acreage
Portions of Buffalo Gulch/Twelvemile Mesa area	4,000
Along some upper tributaries of Sand Wash	3,000
Along some western tributaries of the Little Snake River	17,000
Along some eastern tributaries of the Little Snake River	5,000
Along portions of Sand Creek	2,000
Along portions of Conway Draw	1,000
Portions of the Deception Creek area	1,000
<b>Total</b>	<b>33,000</b>

## PROPOSED RESOURCE MANAGEMENT PLAN

10. Groundwater quality and aquifers would be inventoried within the resource area.
11. Water quality and watershed activity plans would be developed in areas with potential for water quality improvements. The potential for salinity control projects on BLM lands in the Milk Creek, Vermillion Creek, and Little Snake River watersheds would be analyzed.
12. Nonpoint source management actions would be coordinated with federal, state, and local agencies.
13. Roads and trails on BLM lands would be closed and rehabilitated if they have high-erosion rates that could not be corrected.
14. The Little Snake monitoring plan would include proposals for monitoring the impacts of management actions on soil and water resources.
15. BLM would seek appropriate water rights for public land resources and values.

## Forest Lands and Woodlands (Issues 2-7 and 2-8)

1. Existing 10-year forest management plans would continue for Diamond Peak/Middle Mountain and Douglas Mountain.
2. Commercial forest lands (6,330 acres) would be managed to produce a variety of forest products on a sustained yield basis. Limited management (such as natural revegetation and minimal cultural treatments) would apply to remaining commercial forest lands. Allowable harvest levels would remain approximately 300,000 board feet per year until 1987, when the exact allowable harvest would be reevaluated.
3. Approximately 37,600 acres of woodland would be managed to produce a variety of woodland products on a sustained-yield basis. Limited management would apply to the remaining woodland acreage. Annual woodland harvest levels could remain as high as 2,500 cords, or 1.25 million board feet per year.
4. Access would be acquired for future timber sales (see Map 1).
5. Public harvest areas would be opened to meet local demand.

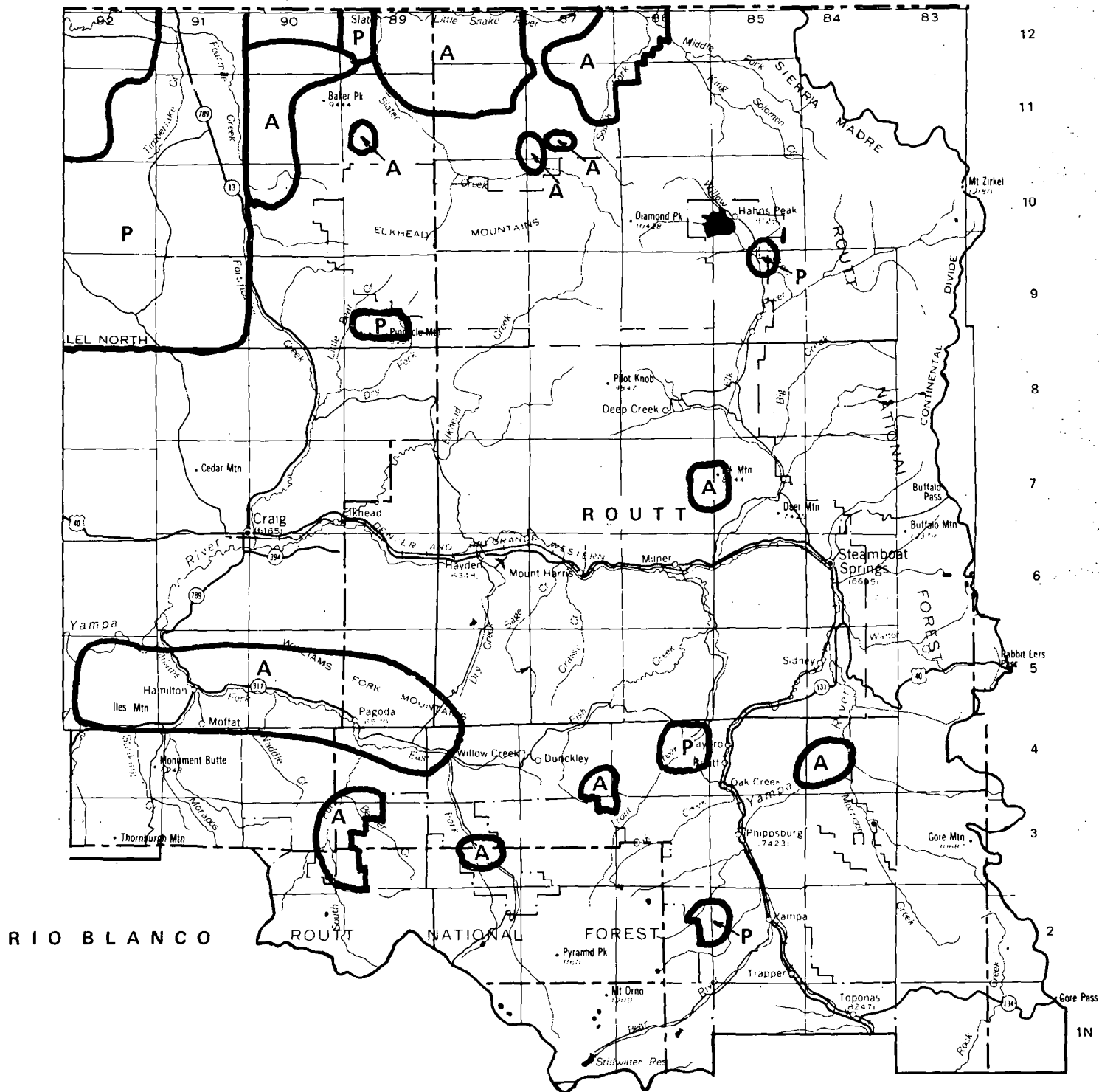


A - Access Needed (AF areas primarily require access for forestry; the rest of the A areas require recreation access)

P - Posting of Boundaries Needed

Map 1. Access and Boundary Posting Needs





## PROPOSED RESOURCE MANAGEMENT PLAN

### Fire Management (Issue 2-9)

A fire management plan (FMP) has been developed for the Little Snake Resource Area.

Maximum Suppression would be used on areas with high-resource values, structures, commercial forest, oil and gas developments, cultural values, improvements, etc. Buffer areas near or adjacent to critical management areas, such as threatened, endangered and candidate species, Colorado BLM sensitive plant species, and research natural areas, would require full protection. Maximum suppression may also be used in other areas to prevent fire from spreading to adjacent private property/structures.

Minimum fire suppression would be used in areas with resources that are low in value or do not warrant full suppression actions and/or high suppression costs. Fires in the Douglas Mountain area (five Dinosaur-adjacent WSAs), Diamond Breaks WSA, West Cold Spring WSA, and Cross Mountain WSA, will be handled under this strategy.

Prescribed fire would be used to improve resource habitat, condition, etc. Both planned and unplanned fires would be used.

### Wilderness (Issue 3-1)

1. The Diamond Breaks Wilderness Study Area (WSA) would be recommended as preliminarily suitable for wilderness designation (Table 6). If Congress does not designate Diamond Breaks as wilderness, the Colorado portion of the WSA (31,480 acres) would be managed as a recreation management priority area; the Utah portion (3,900 acres) would be managed by the Vernal District according to existing management framework plans. (See the Draft RMP/EIS Wilderness Technical Supplement, Diamond Breaks No Wilderness Alternative for more detailed discussion.)
2. The Cross Mountain WSA (including the proposed Cross Mountain Canyon ACEC) would be recommended as preliminarily suitable for wilderness designation. BLM would recommend that the proposed Cross Mountain wilderness would remain open to oil and gas leasing with no-surface-occupancy stipulations (except for Cross Mountain Canyon ACEC, which would be proposed for total mineral withdrawal). If Congress does not designate Cross Mountain as wilderness, the area would be managed as a special recreation management area (13,000 acres), including the Cross Mountain Canyon ACEC (3,000 acres). (See the Draft RMP/EIS Wilderness Technical Supplement, Cross Mountain Preferred Alternative, for more details.)
3. The West Cold Spring WSA would be recommended as nonsuitable for wilderness designation. If Congress does not designate the area as wilderness, the Colorado portion of West Cold Spring would be managed as wildlife, recreation, and livestock management priority areas (total of 14,482 acres). The Utah portion of the WSA would be managed under the Brown's Park Management Framework Plan. (See the Draft RMP/EIS Wilderness Technical Supplement, West Cold Spring Preferred Alternative for more information.)
4. Four WSAs being evaluated under Section 202 of the Federal Land Policy and Management Act (FLPMA)—Ant Hills, Chew Winter Camp, Peterson Draw, and Vale of Tears—would be recommended as nonsuitable for wilderness designation but would be forwarded to Congress for the final decision. If Congress does not designate these areas as wilderness, they would be managed as follows (see Draft RMP/EIS Wilderness Technical Supplement, Preferred Alternative for each of these WSAs, for details):
  - a. The northwest corner of Ant Hills would be managed as a forest lands priority area and the remainder as a minerals priority area.
  - b. Chew Winter Camp would be managed as a minerals priority area.
  - c. The north third of Peterson Draw would be managed as a minerals priority area and the remainder as a forest lands priority area.
  - d. Most of Vale of Tears would be managed as a livestock priority area, and the other portions in the northwest and southeast corners would be managed as minerals, forest lands, and soils/water priority areas.
5. The Tepee Draw WSA, the fifth WSA being evaluated under Section 202 of FLPMA, would be recommended as nonsuitable for wilderness designation. If the Colorado BLM State Director drops this WSA from further consideration, it would be managed as a forest lands priority area.
6. WSAs would continue to be managed in compliance with BLM's Interim Management Policy (BLM, Revised July 12, 1983) until they were reviewed and acted upon by Congress or the BLM Colorado State Director, as appropriate.
7. Public land designated as wilderness would be managed in compliance with BLM's Wilderness Management Policy and the Wilderness Act of 1964. Site-specific wilderness management plans would be developed for such areas after designation by Congress.

**TABLE 6**  
**WILDERNESS SUITABILITY ACREAGES**

Wilderness Study Area	Preliminarily Suitable Acres	Nonsuitable Acres
West Cold Spring	0	17,682
Diamond Breaks	36,240	340
Cross Mountain	14,081	0
Dinosaur Adjacent North WSAs		
Ant Hills	0	4,354
Chew Winter Camp	0	1,320
Peterson Draw	0	5,160
Tepec Draw	0	5,490
Vale of Tears	0	7,420
<b>Total</b>	<b>50,321</b>	<b>41,766</b>

\* 1,200 acres added to enhance manageability.

### Natural History (Issue 3-2)

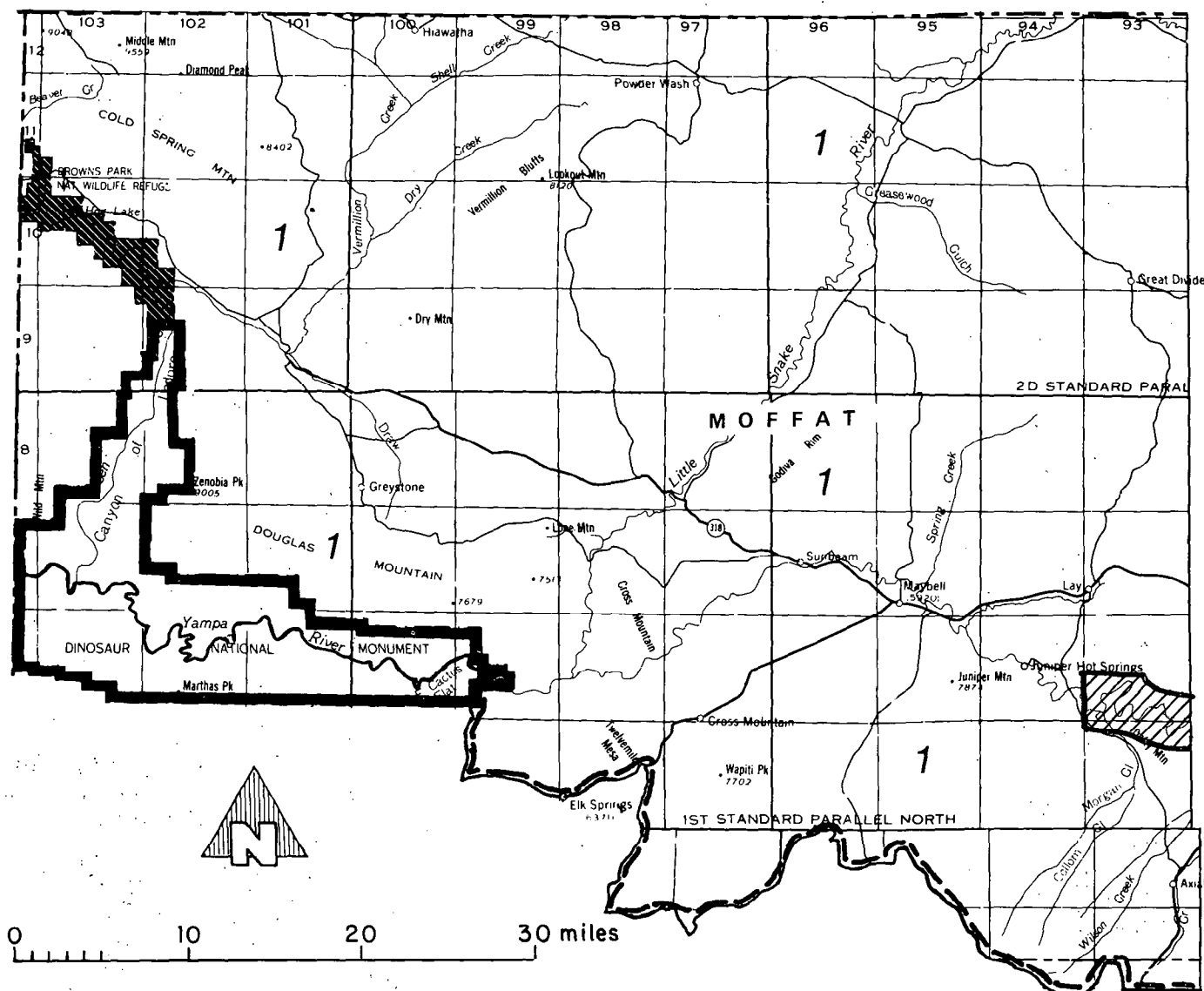
- The following sites would be designated to protect or enhance the values noted:
  - Limestone Ridge ACEC/RNA (1,350 acres; remnant plant associations, Colorado BLM sensitive plant species, scenic quality).
  - Irish Canyon ACEC, including the Ink Springs area originally evaluated for ACEC/RNA designation (11,680 acres; remnant plant associations, Colorado BLM sensitive plant species, geologic values, cultural resources, scenic quality).
  - Lookout Mountain ACEC (6,500 acres; Colorado BLM sensitive plant species, scenic quality).
  - Cross Mountain Canyon ACEC (3,000 acres; threatened and endangered species, Colorado BLM sensitive plant species, scenic quality).
- Activity plans would be written for each designated site. Each site would also be monitored.
- Remnant plant associations would be protected through avoidance stipulations in Ace-in-the-Hole, Hells Canyon, G-Gap, Vermillion Creek, Vermillion Bluffs, and Horse Draw. (An example of an avoidance stipulation can be found under Threatened/Endangered, Candidate, and Sensitive Plants [Issue 2-3].)
- Memorandums of Understanding or Agreement would be developed with the Colorado Natural Areas Program, the Nature Conservancy, and other interested

## PROPOSED RESOURCE MANAGEMENT PLAN

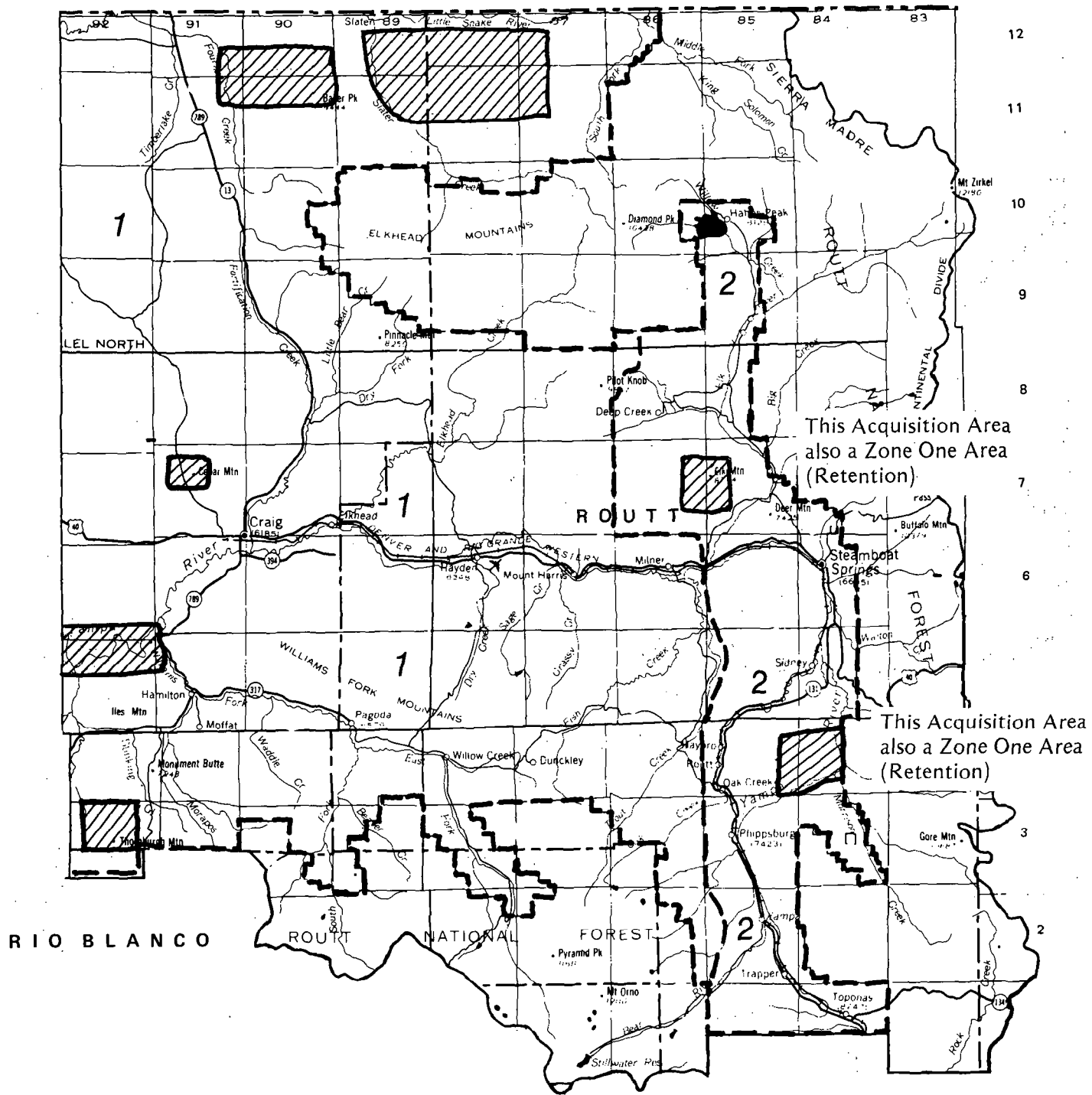
agencies or groups for the purpose of providing recommendations on protecting, managing, and studying the unique resource values found in the designated areas and, as appropriate, elsewhere in the resource area. BLM would still have the sole management responsibility.

### Recreation (Issue 3-3)

- The Little Yampa/Juniper Canyon (19,840 acres) would be administered as a special recreation management area to provide unrestricted flatwater river floatboating in the region. The area would be divided into upper (4,480 acres) and lower (15,360 acres) units. Periodic use supervision would be provided. Access would be negotiated. Parking areas at put-in and take-out points and sanitary facilities would be constructed. A map/brochure would be developed to promote visitor health and safety, provide resource protection, and inform the public of available opportunities. Limited signs would be provided for information, direction, and interpretation. A Little Yampa/Juniper Canyon Recreation Area Management Plan would be developed.
- The rest of the resource area would be managed as an Extensive Recreation Management Area. Management actions to facilitate recreation use would be limited primarily to providing basic information on public safety, access, and recreation opportunities within the resource area.
- BLM lands within Cedar Mountain (880 acres) would be managed as part of the Extensive Recreation Management Area for environmental education, hiking, and viewing. Trails and signs would be provided for information and interpretation. Leasing of the shooting range site would continue, with stipulations for sanitation, visual design, and safety; more public use would be allowed.
- BLM lands within two areas on Cold Spring Mountain (approximately 27,600 acres) would be managed as part of the Extensive Recreation Management Area, primarily for hunting use. The areas would be managed under VRM Class II objectives to maintain scenic quality.
- BLM lands around Wild Mountain (approximately 21,000 acres) would be managed as part of the Extensive Recreation Management Area, primarily for hunting use. The area would be managed under VRM Class II objectives to maintain scenic quality.



Map 2. Retention and Disposal Areas



6. Access to public lands would be acquired as funding and time permit, in the areas listed in Table 7 and displayed on Map 1.

**TABLE 7**  
**AREAS NEEDING PUBLIC ACCESS**

General Location	Public Land (Acres)
Yahoo-Squaw Mountain/West Gilbralter Peak	10,240
Long Mountain	1,200
Bibleback Mountain	2,220
Columbus Mountain	1,100
Serviceberry Mountain	2,800
Crooked Wash/Sagebrush Creek	14,720
Danforth Hills (Escarpment Peak)	3,000
Thornburg Mountain	4,480
Clinker Knob/Coal Mountain	10,000
Iles Mountain	3,000
Williams Fork Mountains	3,000
Pole Gulch area	5,760
Four Mile and Willow Creek area (2 tracts)	5,640
Calico Draw	2,560
West Fork Good Spring	1,600
Blacktail Mountain/Yampa River	1,840
Wapiti Peak and areas south of the peak	1,600
Elk Mountain	1,440
Citadal Plateau	640
North of Little Yampa Canyon	4,480
Juniper Mountain	5,000
Circle Ridge/Beaver Mountain/Piney Mountain/	
Three Forks Mountain (scattered tracts)	2,760
Routt National Forest adjacent parcels	3,680
Axial (parcels)	1,820
Total	94,580

See Map 1 for general location of areas.

### Off-Road Vehicle Designations (Issue 3-4)

Areas would be designated as open, limited, or closed to off-road vehicles, as shown in Table 8. (The map of the proposed plan shows the areas listed in the table.)

### Cultural Resources (Issue 3-5)

1. All cultural resources would be managed, commensurate with the scientific values of the resource.

## PROPOSED RESOURCE MANAGEMENT PLAN

2. An overall cultural resource management plan would be developed that addresses the prehistoric and historical cultural presence in the resource area.

### Paleontological Resources (Issue 3-6)

A program would be developed to systematically inventory, classify, designate, and monitor paleontological resources.

### Acquisition/Disposal Areas (Issue 4-1)

1. The BLM lands in the resource area would be divided into general retention and disposal areas (see Map 2):
  - a. Retention—all land tenure adjustment actions (including recreation and public purposes [R&PP] actions and exchanges), except sales under Section 203 of FLPMA, would be considered on a case-by-case basis, if the public interest would be served. Section 302 leases and permits would be allowed. Conveyance actions would be precluded in wilderness and other special management areas.  
  
New policy revoking authority to authorize sanitary landfills would be applied. This policy is a result of potential federal liability associated with hazardous waste dumping on BLM-administered land. Should operators of existing sanitary landfills, authorized under an R&PP lease, choose to continue operation of the facility upon termination of the existing lease, land-tenure adjustments could occur.
  - b. Disposal—land-tenure-adjustment actions would be allowed on approximately 6,670 acres of public land that meet the criteria for disposal under applicable authority (see Appendix 24 in the Draft RMP/EIS). This acreage includes land-tenure-adjustment actions (i.e., disposal by sale under Section 203 of FLPMA) for the existing BLM-authorized sanitary landfill sites near Oak Creek and Maybell located within the retention area. Section 302 leases and permits would also be allowed.
2. Acquisition of public land, would be pursued, based on identified resource values and needs (see Map 2).
3. BLM would continue to review existing withdrawals and to make recommendations based on resource values and need. Other agency relinquishments would be processed promptly. U.S. Fish and Wildlife Service, National Park Service, and U.S. Forest Service withdrawals are not reviewable. (See Appendix 26 in this document.)

**TABLE 8**  
**OFF-ROAD VEHICLE DESIGNATIONS**

<b>Designation*</b>	<b>Area</b>	<b>Acres</b>	<b>Percentage of Resource Area</b>	<b>Purpose &amp; Restriction of Usage**</b>
Open		998,009	77	No special restrictions
Limited (L)	Cold Spring	69,720	5	Recreation, wildlife habitat: existing roads & trails, seasonal closures, permitted uses
	North Central	50,350	4	Wildlife habitat: existing roads & trails, seasonal closure, permitted uses
	Cross Mountain	4,520	—	Wildlife habitat: existing roads & trails, permitted uses
	Duffy/Isles Mt.	24,320	2	Wildlife habitat: existing roads & trails, permitted uses
	Sand Wash	8,000	1	Fragile soils, deteriorating watershed: existing roads & trails, seasonal closures, permitted uses
	Lower Vermillion Creek Drainage	2,900	—	Fragile soils, deteriorating watershed: existing roads & trails, seasonal closures permitted uses
	Upper Vermillion Creek Drainage	30,600	2	Fragile soils, deteriorating watershed: existing roads & trails, seasonal closures, permitted use
	Irish Canyon	11,680	1	Area of Critical Environmental Concern: designated roads & trails, permitted uses
	Lookout Mountain	6,500	—	Area of Critical Environmental Concern: designated roads and trails, permitted uses
	Cedar Mountain	880	—	Recreation area, eliminate conflicts between motorized/nonmotorized uses: designated roads & trails, permitted uses.
	Wild Mountain	21,000	2	Recreation area, reduce conflicts between motorized/nonmotorized uses: designated roads & trails, permitted uses.
	Little Yampa/Juniper Canyon	19,840	1	Special Recreation Management Area, reduce conflict between motorized and nonmotorized uses: designated roads & trails, permitted uses.
Sub Total (open)		250,310	19	
Closed (C)	Diamond Breaks	36,240	3	Wilderness
	Limestone Ridge	1,350	—	Research Natural Area: closed except for permitted uses.
	Cross Mountain	14,081	1	Wilderness
	Maybell tailings	10	—	Public health/safety
	Matt Trail	—	—	Wildlife, recreation, public safety: closed to vehicle use.
Sub Total (closed)		51,681	4	
Grand Total		1,300,000	100	

\* See the map of the proposed plan.

\*\* Permitted use applies to (1) any nonamphibious registered motorboat; (2) any military, fire, emergency, or law enforcement vehicle while being used for emergency purposes; (3) any vehicle whose use is expressly authorized by the authorized officer, or otherwise officially approved; (4) vehicles in official use; and (5) any combat or combat support vehicle when used in times of national emergencies.

## **Major Rights-of-Way (Issue 4-2)**

1. No rights-of-way corridors would be formally designated.
2. The existing and potential corridors identified as suitable in Table 9 and displayed on Map 3 would be considered open and would be preferred/encouraged routes.
3. Specific areas unsuitable for major rights-of-way are shown in Table 10.
4. Specific areas that would be sensitive for siting major rights-of-way are shown in Table 11.
5. Minor rights-of-way would be processed on a case-by-case basis, generally guided by the criteria identified for major rights-of-way.
6. Rights-of-way would be allowed in all areas if needed to develop valid existing rights.

## **Access, Boundary Marking, and Road Requirements (Issues 5-1, 5-2, and 5-3)**

An access/transportation activity plan would be prepared that lists areas needing attention, types of access to be acquired, preferred and alternate routes, roads and trails to be closed or constructed, survey and support needs, and construction or maintenance guidelines.

## **MANAGEMENT PRIORITY AREAS**

Management priority areas are geographic areas that are unique, significant, or unusually suited for development, management, protection, or use of a particular resource. Management priority areas were delineated for all public lands within the Little Snake Resource Area to identify how particular geographic areas would be managed and to provide a tool for resolution of conflicts (see map of the proposed plan). The discussions in this section of the different kinds of management priority areas and the map of the proposed plan should be used in conjunction with the description of management actions for a full understanding of the proposed plan.

Management priority areas would be managed under the multiple-use concept: lands would not be managed exclusively for the priority use or value, but for other compatible uses and values as well. In a few cases, such

## **PROPOSED RESOURCE MANAGEMENT PLAN**

as proposed wilderness designations, many uses would be restricted, but the majority of the management priority areas would allow most uses to continue.

Environmental values would be considered and appropriately protected within all management priority areas.

Management priority area boundaries depicted on the map of the proposed plan have not, in many cases, been located on the ground. Before specific activity planning decisions are made or project locations are determined, locations of the management priority area boundaries will be determined, to the extent necessary, based on the resource information that was used to place the boundary on the alternative maps. For example, a wildlife priority area may be based on critical winter range, and the boundary might be determined by a ridge line or a vegetative type; it may be necessary to make an arbitrary decision in the case of a gradual transition of actual use by wildlife. Management priority area boundaries or definitions of compatible and excluded uses may also be adjusted, based on new resource data or proposals for site-specific actions. Major changes would require a plan amendment.

The management priority areas depicted on the map may include areas of split-estate (private surface over federal minerals), private, state, or other nonfederal lands. However, the management priority areas apply only to BLM-managed surface and federal mineral estate. On split-estate lands, management priority area designations indicate how BLM would manage the federal mineral estate; they would not dictate other surface uses unrelated to federal mineral development. None of the management priority areas apply to private, state, or other lands or minerals not managed by BLM. In addition, management priority areas do not supersede valid existing rights. Nothing on the map or in this plan should be interpreted as challenging those rights.

Three kinds of management priority areas have been identified in the proposed plan: priority use areas, environmental value areas, and special designations. They are described separately below.

### **Priority-Use Areas**

Priority-use areas are one of the three categories of management priority areas identified in the proposed plan. Land-use priorities addressed in the RMP and shown on the map of the proposed plan include coal, oil and gas, other minerals, federal mineral concern areas, livestock, wildlife, forest lands and woodlands, and recreation. Each use listed has specific areas identified on the map where it has been assigned as a priority for management. The



**TABLE 9**  
**EXISTING AND POTENTIAL RIGHTS-OF-WAY CORRIDORS**

<b>Existing Corridors</b>		
<b>No.*</b>	<b>Use</b>	<b>Suitability for Designation**</b>
1	pipeline, electric transmission line, communication line	suitable
2	electric transmission line, communication line	unsuitable—conflicts with coal, recreation, special management area
3	multiple electric transmissionlines, communication line	unsuitable—conflicts with coal, low percentage of public land
4	pipeline, multiple electric transmission lines, communication line	unsuitable—conflicts with coal, low percentage of public land
5	pipeline, multiple electric transmissionlines, communication line	unsuitable—low percentage of public land
6	electric transmission line, railroad, communication line	unsuitable—low percentage of public land
7	communication line	unsuitable—low percentage of public land
8	pipeline	suitable
9	pipeline	suitable
<b>Potential Corridors</b>		
<b>No.*</b>	<b>Proposed Use</b>	<b>Suitability for Designation**</b>
10	pipeline	unsuitable—coal management priority area; low percentage of public land
11	electric transmission line	unsuitable—low percentage of public land
12	pipeline	unsuitable—coal management priority area; low percentage of public land
13	electric transmission line	unsuitable—low percentage of public land
14	electric transmission line	unsuitable—low percentage of public land
15	electric transmission line	unsuitable—reasonable alternative route previously established***
16	coal slurry pipeline	suitable—no major conflicts, follows #1 above
17	coal slurry pipeline	suitable—no major conflicts
18	coal slurry pipeline, electric transmission line	unsuitable-crosses sensitive and fragile soil and watershed areas, reasonable alternate route established***
19	electric transmission line	unsuitable-crosses sensitive and fragile soil and watershed areas and Dinosaur National Monument, suitable alternate route established***
20	pipeline	suitable***

\* Numbers 1-7 and 9-19 are identified in the 1980 Western Regional Corridor Study.

\*\* Suitability only relates to whether or not a corridor would either be designated or identified as a preferred/encouraged route. The term "unsuitable" is not used to imply preclusion of new facilities, but rather to identify corridors which, under all alternatives, pass through an area containing those important resource values identified in the criteria spelled out in Chapter 1. These "unsuitable" corridors would usually be sensitive to the placement of new facilities and would be subject to the special stipulations referred to under each of the alternatives; they would generally be addressed on a case-by-case basis. They may also be considered unsuitable if they cross little or no public surface ownership.

\*\*\* Sand Wash Alternative - see Rangely Carbon Dioxide Pipeline Final Environmental Impact Statement, February 1985.

# PROPOSED RESOURCE MANAGEMENT PLAN

TABLE 10  
AREAS UNSUITABLE FOR SITING  
MAJOR RIGHTS-OF-WAY

Reason <sup>1</sup>	Area	Acreage	Percentage of Resource Area <sup>2</sup>
Wilderness	Diamond Breaks	36,240	3
	Cross Mountain	14,081	1
Research Natural Areas	Limestone Ridge	1,350	—
Area of Critical Environmental Concern	Irish Canyon	11,680	1
TOTAL		63,351	5

<sup>1</sup> Valid existing rights would be respected.

<sup>2</sup> 1,300,000 acres

principles of multiple use and sustained yield would be maintained in each priority-use area.

All priority-use areas would be open to coal exploration, subject to applicable laws and regulations, as long as it did not conflict with the priority use. Stipulations would be added to coal exploration licenses within any priority-use area to protect the priority use.

Compatible uses are defined below for each priority-use area; incompatible uses, which are excluded, are minimal.

## Coal Priority-Use Areas

### Compatible Uses

Most other uses could occur on coal areas, provided they did not conflict with the priority use. Investments in land treatments and improvement projects for intensive management of other resources on BLM surface may be postponed until coal development is completed and the site is rehabilitated. Postmining land use on federal surface would be determined during activity planning or at the mine plan review stage. Uses that could occur on these lands are:

**Oil and Gas.** Lands would remain open to oil and gas leasing. Concurrent development of oil and gas with coal would be allowed, as long as it did not result in a significant loss of federal coal or significant loss of oil and gas production. Any conflicts arising from concurrent oil and gas and coal development would be settled by the operators.

**Other Minerals.** Lands would remain open to exploration and development of other federal leasable minerals and to location of mining claims. Development of other federal leasable minerals and federal material sales would be allowed, provided they did not conflict with the development of coal.

**Livestock Grazing.** Lands would remain open to livestock grazing until it conflicted with coal development. Intensive management practices or range improvement projects would be permitted only as long as coal development was not imminent. Reclamation efforts to replace livestock forage following mine abandonment would occur, if livestock grazing were determined to be the postmining land use.

**Wildlife.** Wildlife habitats, including threatened or endangered species habitats, would be protected by limits or restrictions placed on the development of federal coal, as the result of application of the coal unsuitability criteria. Loss of other important habitats would be mitigated. Management practices would be allowed on BLM surface, provided coal development was not imminent.

**Forest Lands and Woodlands.** Lands would remain open to harvesting of forest and woodland products on BLM surface until it conflicted with coal development. When mining occurred, proper disposal of timber products would be required.

**Recreation.** Lands would remain open to dispersed recreation until it conflicted with mineral exploration and development. Limited develop-

## PROPOSED RESOURCE MANAGEMENT PLAN

ment could be allowed in areas proposed for underground mining.

*Realty Actions.* Realty actions could occur on these lands as long as they did not interfere with claim operations.

### *Excluded Uses*

The following uses would not be allowed on other mineral priority areas:

*Recreation.* Developed recreation sites would not be established in areas to be surface mined.

### **Federal Mineral Concern Areas**

BLM has a number of concerns regarding important, unique, or fragile resources on split-estate lands where surface disturbing activities may result because of leasing and developing federal minerals. These areas are called federal mineral concern areas (FMCAs). The activity planning process will analyze environmental impacts of cumulative land use for all public lands, including FMCAs. Based on this analysis and the significance of the environmental impacts (both from and to oil and gas development), mitigative measures may be developed. This process is not an attempt to dictate to a private surface owner how to manage private surface. Any designation in either this document or the activity plan would not dictate pre- or post-mineral development land uses or any other uses unrelated to federal mineral development.

These important, unique, or fragile resources can be protected with certainty only with the concurrence and cooperation of the private surface owner. Therefore, during consideration of leasing and development of federal minerals on these lands, efforts will be made to identify environmental concerns and solicit the input of private surface owners regarding management of federal mineral development activity on their surface; private surface owners are encouraged to become involved in the activity planning process. BLM's actions will be consistent with the wishes of the surface owner, to the extent possible, but impacts to adjacent federal lands or resources, threatened or endangered species, or other resource values protected by nondiscretionary statutes will be mitigated to an acceptable level, as approved by the authorized officer.

### *Wildlife FMCAs*

#### **Compatible Uses**

Uses that could occur in wildlife FMCAs are:

*Coal.* Wildlife FMCAs would remain open to leasing of federal coal resources for underground mining within the coal planning area. Special stipulations could be added to new federal leases to protect or mitigate impacts to wildlife habitat, along with standard lease stipulations.

*Oil and Gas.* Wildlife FMCAs would remain open to oil and gas leasing and development. Special stipulations could be placed on development of federally owned oil and gas resources within new lease areas to protect wildlife habitat, along with standard lease stipulations. BLM's intent is to work with the private landowner to develop those special stipulations that are mutually acceptable.

*Other Minerals.* Wildlife FMCAs would remain open to mineral exploration and development. Land would remain open to leasing other federal leasable minerals and federal mineral material sales, provided adverse impacts could be mitigated to an acceptable level.

#### **Other Uses**

All surface uses unrelated to federal mineral development would be determined by the surface owner. In the case of mixed mineral ownership, development of any nonfederal minerals would be determined by the owner of those minerals.

#### **Excluded Uses**

The following use would be excluded from wildlife FMCAs:

*Coal.* Lands would not be leased for development involving surface mining of federally owned coal.

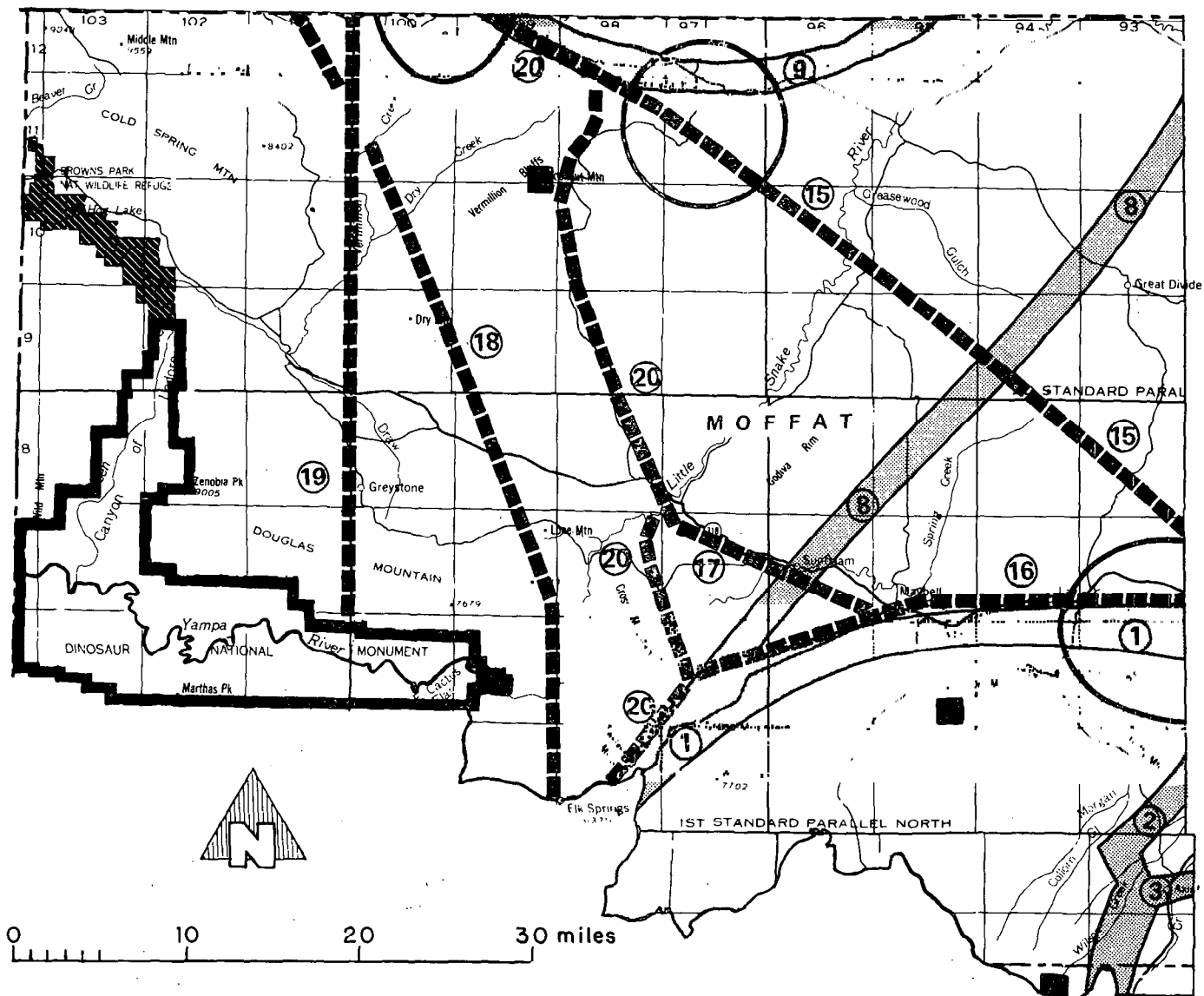
### *Soil and Water Resource FMCAs*





#### **Compatible Uses**

Development of federal minerals would be allowed provided that significant increases in sediment yield and salt loading or decreases in soil productivity and contamination of both surface and subsurface water were prevented or mitigated to an acceptable level. Special performance objectives may be applied in some areas that meet critical soil criteria (see Management Actions, Soil and Water Resources [Issues 2-5 and 2-6]).

#### **Other Uses**

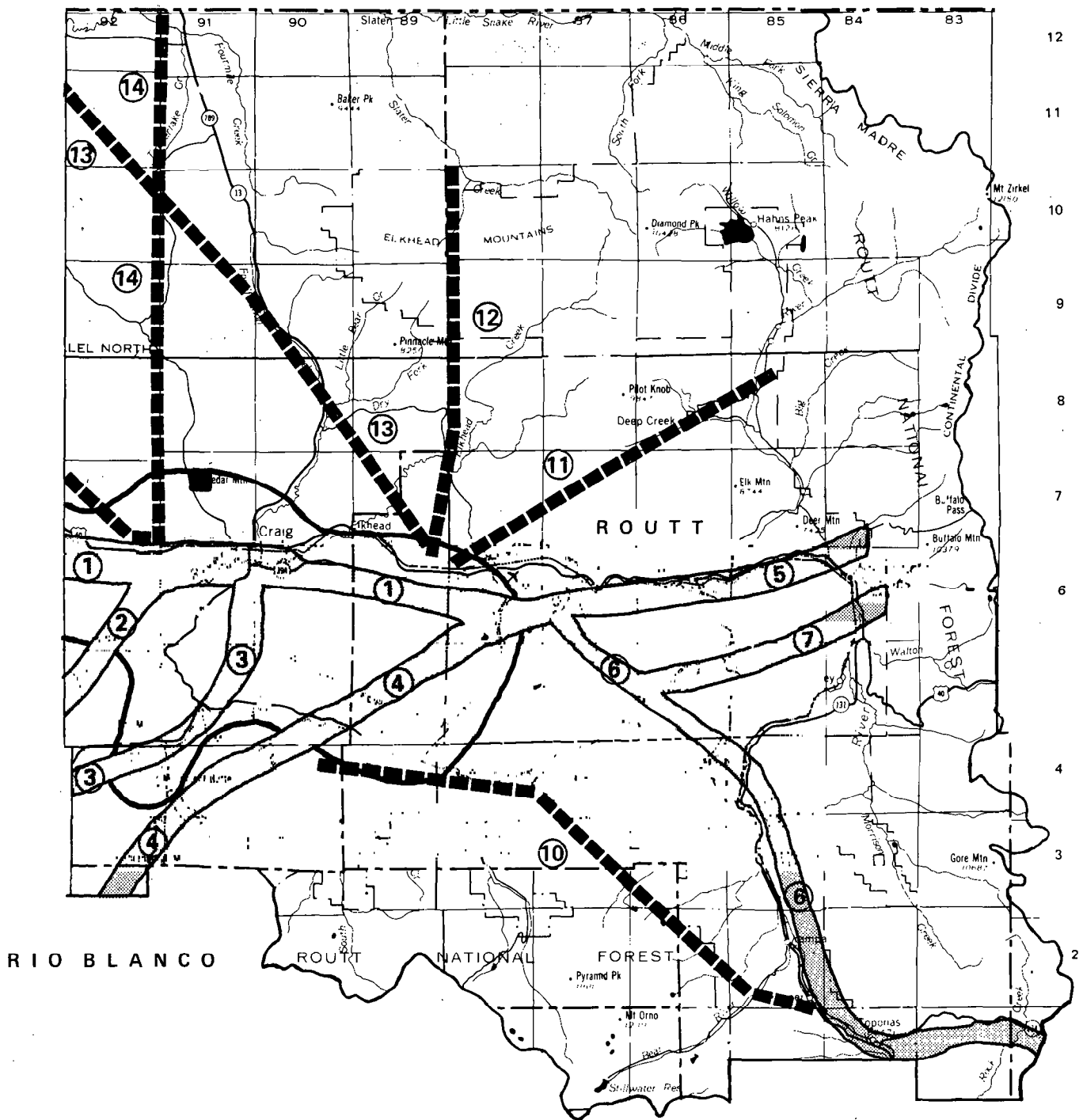
All surface uses unrelated to federal mineral development would be determined by the surface owner. In the case of mixed mineral ownership, development of any nonfederal minerals would be determined by the owner of those minerals.



-  Existing Right-of-Way Corridors \*
-  Potential Right-of-Way Corridors \*
-  Existing communications sites
-  Areas currently supporting a high concentration of minor linear rights-of-Way

\* Identified in the 1980 Western Regional Corridor Study

Map 3. Major Rights-of-Way



**TABLE 11**  
**AREAS SENSITIVE FOR SITING MAJOR RIGHTS-OF-WAY**

Reason	Area	Acreage	Percentage of Resource Area <sup>1</sup>	Type of Restrictions <sup>2</sup>
Special Recreation Management Area	Little Yampa/ Juniper Canyon	19,840	2	No major rights-of-way unless associated with logical development of the Hles Mountain coal tract
Area of Critical Environmental Concern	Lookout Mountain	6,500	—	Avoidance stipulations
Colorado BLM Sensitive Plants or Remnant Plant Associations	Horse Draw	690	—	Avoidance stipulations
	Vermillion Creek	200	—	
	Ace-in-the-Hole	260	—	
	Vermillion Bluffs	580	—	
	G Gap	275	—	
	Hells Canyon	280	—	
		2,285	—	
Soil/Water Resources	Portions of Vermillion Creek Drainage, and Sand Wash Drainage	38,840	3	Performance standards, seasonal restrictions, avoidance stipulations, soil stabilization measures
	Buffalo Gulch/Twelvemile Mesa	4,000	—	
	Little Snake River	22,000	2	
	Sand Creek	2,000	—	
	Conway Draw	1,000	—	
	Deception Creek	1,000	—	
	Subtotal	68,840	5	
Coal	Not available	Not available	Not available	Avoidance of known surface mining areas
Other Minerals	Not available	Not available	Not available	Avoidance of known surface mining areas and known mining claims
	<b>TOTAL</b>	<b>97,465</b>	<b>7</b>	

<sup>1</sup> 1,300,000 acres

<sup>2</sup> Valid existing rights would be respected

## PROPOSED RESOURCE MANAGEMENT PLAN

### Livestock Grazing Priority Use-Areas

#### *Compatible Uses*

Other uses would be allowed, provided impacts to livestock grazing or range management could be prevented or mitigated. Uses that could occur on these lands are:

**Coal.** Lands would remain open to leasing of federal coal resources within the coal planning area. In addition to standard stipulations, special stipulations could be added to new federal coal leases to protect vegetation and range improvements.

**Oil and Gas.** Lands would remain open to federal oil and gas leasing and development. In addition to standard stipulations, special stipulations could be placed on development of federally owned oil and gas resources to protect the priority use within new lease areas.

**Other Minerals.** Lands would remain open to federal mineral material sales and leasing of other leasable minerals, provided adverse impacts could be mitigated to an acceptable level, and to locatable mineral exploration and development.

**Wildlife.** Lands would remain open to intensive wildlife habitat management or projects on BLM surface, provided they did not conflict with livestock grazing or range management.

**Wild Horses.** Lands would remain open to wild horse use, provided that competition with livestock for forage did not occur. Wild horse projects or developments would be designed so as to not conflict with livestock grazing or range management.

**Forest Lands and Woodlands.** Lands would remain open to harvesting forest lands and woodlands provided it did not conflict with livestock grazing or range management. Management practices designed to enhance livestock grazing would be emphasized.

**Recreation.** Developed recreation sites could be established on these BLM lands, provided they were designed so as not to conflict with livestock grazing or range management. Lands would remain open to dispersed recreation, provided it did not conflict with livestock grazing or range management.

**Realty Actions.** Realty actions could occur, provided impacts to livestock grazing or range management could be prevented or mitigated to

an acceptable level. Land adjustments could occur where the public interest would be best served and where the specific criteria of applicable laws were met.

### Wildlife Priority-Use Areas

#### *Compatible Uses*

Uses that could occur on these lands are:

**Coal.** Lands would remain open to leasing of coal in the coal planning area. In addition to standard lease stipulations, special stipulations could be added to new federal leases to protect or mitigate impacts to wildlife habitat.

**Oil and Gas.** Lands would remain open to federal oil and gas leasing and development. In addition to standard stipulations, special stipulations could be placed on development of federally owned oil and gas resources to protect wildlife habitat within new lease areas.

**Other Minerals.** Lands would remain open to leasing of other leasable minerals and mineral material sales, provided adverse impacts could be mitigated to an acceptable level, and to locatable mineral exploration and development.

**Livestock Grazing.** Lands would remain open to livestock grazing. Intensive management or projects on BLM surface would be designed to enhance wildlife habitat.

**Forest Lands and Woodlands.** Lands would remain open to harvesting of timber on forest lands and woodlands, provided it did not conflict with wildlife habitat. Management practices designed to enhance the wildlife habitat values in these areas would be emphasized.

**Recreation.** Lands would remain open to dispersed recreation, and developed recreation sites could be established on these BLM lands, provided they did not conflict with wildlife habitat values. Off-road-vehicle use in wildlife priority areas would be limited to existing roads and trails.

**Realty Actions.** These could occur provided impacts to critical wildlife habitat could be prevented or mitigated to an acceptable level. Land adjustments could take place where the public interest would be best served and where the specific criteria of applicable laws were met.

## PROPOSED RESOURCE MANAGEMENT PLAN

### Forest Lands and Woodlands Priority-Use Areas

#### Compatible Uses

Uses that could occur on these lands are:

**Coal.** Lands would remain open to leasing of federally owned coal resources within the coal planning area. Special stipulations could be placed on new coal leases to protect or mitigate impacts to productive forest lands and woodlands.

**Oil and Gas.** Lands would remain open to oil and gas leasing and development. Stipulations could be placed on new federal oil and gas leases to protect or mitigate impacts to productive forest lands and woodlands.

**Other Minerals.** Lands would remain open to mineral material sales and to leasing of other leasable minerals, provided adverse impacts could be mitigated to an acceptable level, and to locatable mineral exploration and development.

**Livestock Grazing.** Lands would remain open to livestock grazing and range management. Grazing management practices and projects would be designed to be compatible with the growth and management of forest and woodland products.

**Wildlife.** Lands would remain open to intensive wildlife habitat management or projects, provided they did not conflict with the growth and management of forest and woodland products.

**Wild Horses.** Lands would remain open to wild-horse use. Wild horse projects and management practices would be designed to be compatible with harvesting operations or with other forest land/woodland management actions.

**Recreation.** Lands would remain open to dispersed recreation and developed recreation sites could be established, provided they did not interfere with intensive forest management.

**Realty Actions.** Realty actions would be allowed, provided impacts to commercial forest land or woodlands could be prevented or mitigated to an acceptable level. Land adjustments could occur where the public interest would be best served and where the specific criteria of applicable laws were met.

#### Excluded Uses

The following uses would be excluded from forest product priority areas:

**Realty Actions.** Actions that would take a significant amount of commercial forest land or woodlands permanently out of production would not be allowed.

### Recreation Priority-Use Areas

#### Little Yampa/Juniper Canyon SRMA

Little Yampa/Juniper Canyon would be managed as an SRMA, divided into an upper unit (4,480 acres east of Milk Creek) and a lower unit (15,360 acres west of Milk Creek). The following compatible and excluded uses would apply to both units, unless otherwise noted.

#### Compatible Uses

The following uses could occur, subject to meeting the recreation and visual resource (VRM Class II) management objectives for the SRMA:

**Coal.** The SRMA would remain open to leasing for underground mining of federally owned coal with no-surface-occupancy stipulations.

**Oil and Gas.** The SRMA would remain open to oil and gas leasing, with no-surface-occupancy stipulations on new federal leases.

**Other Minerals.** The SRMA would remain open to leasing of other leasable minerals for underground mining, with no-surface-occupancy stipulations, and to locatable mineral exploration and development.

**Livestock Grazing.** The SRMA would remain open to livestock grazing, except within developed or intensively used recreation sites, and to intensive management or projects if they were designed to benefit recreation and visual resource management objectives or if they did not conflict significantly with these objectives.

**Wildlife.** The SRMA would remain open to intensive wildlife management or projects if they were designed to benefit recreation and visual management objectives or if they did not conflict significantly with these objectives.

**Off-Road Vehicles.** Vehicle use would be limited to designated roads and trails, except as associated with valid existing rights.

**Realty Actions.** Ownership adjustments would be allowed where they would help achieve recreation management objectives. Management of the upper Little Yampa Canyon unit would not preclude logical development of the Iles Mountain coal tract, if leased. Necessary rights-



## PROPOSED RESOURCE MANAGEMENT PLAN

of-way associated with development of the proposed Iles Mountain coal tract would be processed through the established procedures, which might entail mitigation, including reciprocal rights-of-way. Rights-of-way would be allowed in either unit if associated with valid existing rights or permitted uses.

### Excluded Uses

The following uses would not be allowed within the SRMA:

*Coal.* Lands would not be leased for development involving surface mining of federally owned coal.

*Other Minerals.* Sales of sand and gravel and other mineral materials would not be allowed. Lands would not be leased for other mineral development involving surface mining of federally owned minerals.

*Forest Lands and Woodlands.* No timber sales or woodcutting would be allowed.

*Realty Actions.* No new rights-of-way would be allowed, except as described under compatible uses.

### *Cold Spring and Wild Mountain Recreation Priority Areas*

#### Compatible Uses

Within the two Cold Spring areas and the Wild Mountain area, most uses would be allowed, provided adverse impacts to recreational values could be prevented or mitigated to the satisfaction of the authorized officer. To eliminate harassment to wildlife, ORV use would be limited to existing roads and trails and permitted uses.

#### Excluded Uses

*Coal.* No coal leasing would be allowed.

*Off-Road Vehicles.* The Matt Trail would remain closed to vehicle use for safety.

### *Cedar Mountain Recreation Priority Area*

#### Compatible Uses

The following uses could occur:

*Coal.* Cedar Mountain would remain open to leasing for underground mining of federally owned coal with no-surface-occupancy stipulations on new leases.

*Oil and Gas.* Cedar Mountain would remain open to oil and gas leasing with no-surface-occupancy stipulations on new leases.

*Other Minerals.* The area would remain open to leasing of other federal minerals for underground mining, with no-surface-occupancy stipulations on new leases, and to locatable mineral exploration and development.

*Livestock Grazing.* The area would remain open to livestock grazing, except within developed or intensively used recreation sites, and to intensive management or projects if they were designed to benefit recreation and visual resource management objectives or did not conflict significantly with these objectives.

*Wildlife.* The area would remain open to intensive wildlife management or projects, if they were designed to benefit recreation and visual management objectives or did not conflict significantly with these objectives.

*Off-Road Vehicles.* Vehicle use would be limited to designated roads and trails, except as associated with valid existing rights.

*Realty Actions.* Ownership adjustments would be allowed where they would help achieve recreation management objectives. Other actions would be allowed, if they were compatible with the recreation management objectives or subject to valid existing rights.

#### Excluded Uses

*Coal.* Lands within the Cedar Mountain recreation area would not be leased for development involving surface mining of federally owned coal.

*Other Minerals.* Federal mineral material sales would not be allowed and lands would not be leased for surface mining of other federally owned minerals.

*Forest Lands and Woodlands.* No timber sales or woodcutting would be allowed.

## Environmental Value Areas

A second kind of management priority area identified in the proposed plan is environmental value areas, which contain important or fragile resources that may need special protection from surface-disturbing activities. Environmental values would be considered and appropriately protected in all management priority areas. Requirements for specific environmental values can be found in the Management Actions section.

## PROPOSED RESOURCE MANAGEMENT PLAN

Two kinds of soil and water priority areas have been identified specifically for management emphasis. No uses would be excluded in these areas, but all uses would have to meet the standards established under compatible uses below to protect soil and water values.

### Soil and Water Areas

#### *Compatible Uses*

Other uses would be allowed provided that significant increases in sediment yield and salt loading or decreases in soil productivity and contamination of both surface and subsurface water were prevented or mitigated to an acceptable level. Restrictions could include no-surface-occupancy stipulations or special performance objectives in some areas that met critical soil criteria (see Management Actions, Soil and Water Resources [Issues 2-5 and 2-6]). Uses that could occur in soil and water priority areas are:

**Coal.** Lands would remain open to coal exploration, and within the coal planning area, to leasing of federally owned coal resources. Special stipulations could be added to exploration licenses and new federal coal leases, in addition to standard stipulations, to protect or mitigate impacts to soils and water (both surface and subsurface).

**Oil and Gas.** Lands would remain open to oil and gas leasing. Special stipulations, in addition to standard stipulations, could be placed on federally controlled exploration and development activities within new lease areas to prevent or mitigate impacts to soils and water.

**Other Minerals.** Lands would remain open to leasing of federal minerals and mineral material sales, provided adverse impacts could be mitigated to an acceptable level, and to locatable mineral exploration and development.

**Livestock Grazing.** Lands would remain open to livestock grazing. Range management practices and projects would be designed to be compatible with soil and water values.

**Wildlife.** Lands would remain open to intensive wildlife management or projects, if they were designed to be compatible with soil and water values.

**Wild Horses.** Lands would remain open to wild horse use. Wild horse projects and management practices would be designed to be compatible with soils and water values.

**Forest Lands and Woodlands.** Lands would remain open to harvesting of timber on forest lands and woodlands, provided it did not conflict with soil and water values.

**Recreation.** Lands would remain open to dispersed recreation and developed recreation sites could be established, provided they did not conflict with soils and water values. Restrictions could be placed on off-road vehicle use.

**Realty Actions.** Actions could be allowed where the use of stipulations would protect soil and water resources. Land adjustments could occur where the public interest would be best served and the specific criteria of applicable laws were met.

### Fragile Soil and Water Areas

#### *Compatible Uses*

All resource uses and management practices would be compatible if the disturbing activity would not cause increases in soil erosion and/or sediment yield. See Management Actions, Soils and Water Resources (Issues 2-5 and 2-6) for specific criteria.

### Special Designations

The third kind of management priority area identified in the proposed plan is special designations, which are proposed wilderness areas, areas of critical environmental concern (ACECs), and research natural areas (RNAs). Areas designated as RNAs would also be designated as ACECs.

### Proposed Wilderness Areas

Public lands that would be recommended to Congress as suitable for designation as part of the National Wilderness Preservation System are shown in the wilderness priority areas. As directed by Section 603(c) of FLPMA, public lands designated by Congress as wilderness would be managed under the provisions of the Wilderness Act. In general, wilderness areas would be devoted to recreational, scenic, scientific, educational, conservation, and historical values.

In addition to the basic management authority in the Wilderness Act, management provisions may appear in the legislation establishing each wilderness area. Specific policy guidance on wilderness management is contained in the BLM publication, Wilderness Management Policy, September 1981.

## PROPOSED RESOURCE MANAGEMENT PLAN

### *Excluded Uses*

Section 4(c) of the Wilderness Act prohibits certain activities:

Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness areas designated by this Act and, except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.

**Exceptions.** Sections 4(c), and 4(d), and 5 of the Wilderness Act provide special exceptions to the prohibitions in Section 4(c) by providing for the following:

1. Existing private rights.
2. Measures required in emergencies involving the health and safety of persons within the area.
3. Activities and structures that are the minimum necessary for the administration of the area as wilderness.
4. Use of aircraft and motorboats, where already established.
5. Measures necessary for the control of fire, insects, and diseases.
6. Any activity, including prospecting, for the purpose of gathering information about mineral or other resources, if carried on in a manner compatible with the preservation of the wilderness environment. (This includes mineral surveys conducted on a planned, recurring basis by the U.S. Geological Survey and Bureau of Mines.)
7. Water resource developments authorized by the President, where it is determined that such use will better serve the interests of the United States than will its denial.
8. Livestock grazing, where already established.
9. Commercial services necessary for activities that are proper for realizing the recreational or other wilderness purposes of the areas.
10. Adequate access to surrounded state owned and privately owned lands. If this cannot be provided, such lands are to be exchanged for federally owned lands.

11. Ingress and egress to surrounded valid mining claims and other valid occupancies.

### **Proposed Areas of Environmental Issues**

#### *Lookout Mountain ACEC*

##### **Compatible Uses**

In general, the Lookout Mountain ACEC would be open to other resource uses and management practices, as long as they did not conflict with the values for which the ACEC was designated. Avoidance stipulations would be applied to activities when appropriate to protect these values. Vehicle use would be restricted to designated roads and trails, except for permitted uses.

The avoidance stipulation, when applied, would incorporate wording to the effect that "the habitat of known populations of Colorado BLM sensitive plants and scenic values would be protected from human-induced activities whenever possible." For Colorado BLM sensitive plants, the area of protection would include the actual location of the population and, if present, adjacent critical sites that affect their habitat. Valid existing rights would be respected.

##### **Excluded Uses**

*Coal.* No coal leasing would be allowed because the ACEC is outside the coal planning area.

#### *Irish Canyon ACEC*

##### **Compatible Uses**

Irish Canyon ACEC would be open to most resource uses and management practices, as long as they did not conflict with the values for which the ACEC was designated. Avoidance stipulations would be applied to activities when appropriate to protect these values. Vehicle use would be restricted to designated roads and trails, except for permitted uses. Ownership adjustments would be allowed where they would help achieve ACEC objectives.

The avoidance stipulation, when applied, would incorporate wording to the effect that "the habitat of known populations of Colorado BLM sensitive plants, remnant plant associations specifically identified, geologic values, cultural resources, and scenic quality would be protected from human-induced activities whenever possible." For Colorado BLM sensitive plants, the area of protection would include the actual location of the population and, if present, adjacent critical sites that affect their habitat. Valid existing rights would be respected.

##### **Excluded Uses**

The following uses would be excluded in Irish Canyon ACEC:

## PROPOSED RESOURCE MANAGEMENT PLAN

*Coal.* No coal leasing would be allowed because the ACEC is outside the coal planning area.

*Forest Lands and Woodlands.* No timber sales or woodcutting would be allowed.

*Realty Actions.* Realty actions would not be allowed unless associated with valid existing rights.

### Cross Mountain Canyon ACEC

#### Compatible Uses

Cross Mountain Canyon ACEC would be recommended for a total withdrawal from mineral entry. If a withdrawal were not obtained from Congress, minerals would be handled as described below. Valid existing rights would be respected.

*Oil and Gas.* The ACEC would remain open to oil and gas leasing with a no-surface-occupancy stipulation on new federal leases. Avoidance stipulations to protect the specific values of the ACEC would be placed on applications for permit to drill for existing federal leases, consistent with lease rights granted.

The avoidance stipulation, when applied, would incorporate wording to the effect that "the habitat of known populations of Colorado BLM sensitive plants and scenic values (VRM Class I) would be protected from human-induced activities whenever possible." For Colorado BLM sensitive plants, the area of protection would include the actual location of the population and, if present, adjacent critical sites that affect their habitat.

*Other Minerals.* The ACEC would remain open to locatable mineral entry but, where necessary and required by law or policy, exploration and development would be restricted to protect the values of the ACEC. The ACEC would remain open to leasing of other federal minerals for underground mining with no-surface-occupancy stipulations on new leases. Avoidance stipulations would be required for development of existing leases, consistent with lease rights granted (see Oil and Gas above).

*Livestock Grazing.* The ACEC would remain open to livestock grazing and management. Range improvements would be allowed, as long as they did not detract from the values for which the ACEC was designated.

*Wildlife.* The ACEC would remain open to wildlife habitat management. Wildlife habitat improvement projects would be allowed, as long as they did not detract from the values for which the ACEC was designated.

*Recreation.* The ACEC would remain open to nonmotorized recreation, provided it did not interfere with the values for which the ACEC was designated.

*Realty Actions.* Ownership adjustments would be allowed where they would help achieve ACEC management objectives.

#### Excluded Uses

*Coal.* No coal exploration or leasing would be allowed.

*Oil and Gas.* If a mineral withdrawal were obtained, new federal oil and gas leasing would not be allowed.

*Other Minerals.* No mineral material sales would be allowed, and the area would not be leased for other mineral development involving surface mining. If a mineral withdrawal were obtained, no leasing, locatable mineral entry, or mineral material sales would be allowed.

*Forest Lands and Woodlands.* No commercial timber sales or woodcutting would be allowed.

*Recreation.* The ACEC would be closed to off-road vehicle use, except for permitted uses.

*Realty Actions.* Realty actions, such as linear rights-of-way, would not be allowed, unless associated with valid existing rights.

### Limestone Ridge ACEC/RNA

#### Compatible Uses

*Oil and Gas.* The ACEC/RNA would remain open to oil and gas with no surface occupancy on new federal leases. Avoidance stipulations to protect the specific values of the RNA would be placed on applications for permit to drill for existing federal leases, consistent with lease rights granted. The avoidance stipulation, when applied, would incorporate wording to the effect that "the habitat of known populations of Colorado BLM sensitive plants, remnant plant associations specifically identified, and scenic values would be protected from human-induced activities whenever possible." For Colorado BLM sensitive plants, the area of protection would include the actual location of the population and, if present, adjacent critical sites that affect their habitat. Valid existing rights would be respected.

*Other Minerals.* The ACEC/RNA would remain open to locatable mineral entry. Where necessary and allowed by law, avoidance stipulations would be placed on development of

## PROPOSED RESOURCE MANAGEMENT PLAN

locatable minerals and leasable minerals under existing leases (see Oil and Gas above). No-surface-occupancy stipulations would be placed on new federal leases.

*Livestock Grazing.* The ACEC/RNA would remain open to livestock grazing and management, as long as they did not detract from the values for which the ACEC was designated.

*Wildlife.* The ACEC/RNA would remain open to wildlife habitat management, provided it did not detract from the values for which the ACEC was designated.

*Recreation.* The area would remain open to nonmotorized dispersed recreation, provided it did not interfere with the values for which the ACEC/RNA was designated.

*Realty Actions.* Ownership adjustments would be allowed where they would help achieve ACEC/RNA management objectives.

### Excluded Uses

*Coal.* No coal exploration or leasing would be allowed.

*Other Minerals.* No mineral material sales would be allowed.

*Livestock Grazing.* No range developments, projects, or treatments would be allowed.

*Wildlife.* No wildlife habitat developments, projects, or treatments would be allowed.

*Forest Lands and Woodlands.* No commercial timber sales or woodcutting would be allowed.

*Recreation.* Neither developed recreation sites nor intensive recreational use would be allowed. No off-road vehicle use would be allowed, except for exercise of valid existing rights.

*Realty Actions.* Realty actions, such as linear rights-of-way, would be excluded unless associated with valid existing rights.

## **Public Comments**

# PUBLIC COMMENTS

In the course of preparing this resource management plan, considerable formal and informal efforts have been made to involve the public, other federal agencies, state agencies, and local governments in the planning process. Several points of public participation are mandated by BLM regulations and, in addition, other opportunities have been provided for public comment.

## PUBLIC PARTICIPATION

The planning process began in June 1983 with issue identification. An initial mailing list of about 1,000 individuals, organizations, and government agencies was developed so that all interested parties could be informed as the RMP evolved. The following list highlights the major public participation activities in preparation of the draft RMP/EIS.

- June 23, 1983—Notice of intent to prepare Little Snake RMP/EIS, published in *Federal Register*.
- July 3, 1983—Mailer requesting public comments to determine the scope of the RMP/EIS and identify issues; included call for coal resource information.
- July 18, 19, and 23, 1983—Public scoping meetings in Denver, Steamboat Springs, and Craig, Colorado.
- July 26, 1983—Request for mineral resource information (sent by RMOGA and IPAMS to their members at BLM request).
- February 24, 1984—Mailer requesting public comments on the proposed coal planning area.
- April 1984—Little Snake RMP Report #1 (newsletter requesting public comment on issues and planning criteria).
- October 1984—Little Snake RMP Report #2 (newsletter informing public of preliminary RMP alternatives).
- October 23, 1984—Supplement to notice of intent published in *Federal Register*.
- March 5, 1985—Meeting with various interest group representatives to discuss the proposed Preferred Alternative.
- March 7, 1985—Request for comments from March 5, 1985, meeting participants on proposed Preferred Alternative as a follow-up to March 5, 1985, meeting. April 8, 1985—Little Snake RMP Livestock/Wildlife Workshop, involving representatives of the livestock industry and the Colorado Division of Wildlife, to obtain

proposals for wildlife and livestock numbers in the Preferred Alternative.

September 21 and 22, 1985—Meeting with Little Snake RMP workgroup to obtain proposals for any additional alternative. No consensus was reached on a new alternative, but comments were provided on various portions of the preliminary draft RMP/EIS.

March 6, 1986—The District Advisory Council sponsored a meeting to provide the public another opportunity to discuss the RMP/EIS and Wilderness Technical Supplement.

April 29, 1986—Meeting with Rocky Mountain Oil and Gas Association to discuss the draft plan and their concerns about leasing and development of fluid minerals.

June 20, 1986—Meeting with Environmental Protection Agency to discuss their comments and our responses.

In addition, numerous informal meetings with individuals were held throughout the process, and many requests for specific information were responded to. Both the Craig District Advisory Council and the Craig District Grazing Advisory Board have been briefed about the status of the RMP on numerous occasions and their comments have been solicited.

Informal consultation has been initiated with the U.S. Fish and Wildlife Service. A list of threatened or endangered species that could be affected by this planning effort was requested on October 2, 1985. The U.S. Fish and Wildlife Service responded on October 11, 1985, with a memorandum furnishing a list of federally listed threatened or endangered and candidate species that may be within the area of influence of the RMP. This memorandum stated that "it is impossible through one consultation to render 'may affect' or 'no effect' determination on all programs and activities that may be identified in the RMP/EIS" (see Appendix 25). We agree. A biological assessment will be prepared for activity plans or site specific actions that may be undertaken to implement the RMP and that may affect a threatened, endangered, or candidate species.

## **PUBLIC COMMENTS**

## **DISTRIBUTION LIST**

The Draft Little Snake Resource Management Plan and Environmental Impact Statement was sent to the agencies and organizations listed below, as well as the companies, universities, congressional delegations, members of the Craig District Advisory Council and Grazing Advisory Board, and numerous individuals.

### **Federal Agencies**

Advisory Council on Historic Preservation  
Environmental Protection Agency  
Federal Highway Administration  
Small Business Administration  
U.S. Department of Agriculture  
    Agriculture Stabilization and Conservation Service  
    U.S. Forest Service  
    Soil Conservation Service  
U.S. Department of Commerce  
U.S. Department of Defense  
U.S. Department of Energy  
    Federal Energy Regulatory Commission  
    Western Area Power Administration  
U.S. Department of Housing and Urban Development  
U.S. Department of the Interior  
    Bureau of Indian Affairs  
    Bureau of Mines  
    Bureau of Reclamation  
    Minerals Management Service (Offshore)  
    National Park Service  
    Office of Surface Mining  
    U.S. Fish and Wildlife Service  
    U.S. Geological Survey  
U.S. General Accounting Office

### **Local Agencies and Governments**

Associated Governments of Northwest Colorado  
Daggett County Commissioners  
Lincoln/Unitah Association of Governments  
Moffat County Commissioners  
Moffat County Planning Department  
Northwest Colorado Council of Governments  
Northern Colorado Water Conservancy District  
Rifle Chamber of Commerce

Rio Blanco County Commissioners  
Rio Blanco County Development Department  
Routt County Commissioners  
Routt County Regional Planning Department  
Utah Basin Association of Governments  
Utah County Commissioners

### **State Agencies**

Colorado Department of Agriculture  
Colorado Department of Health  
Colorado Department of Highways  
Colorado Department of Labor and Employment  
Colorado Department of Natural Resources  
Colorado Division of Wildlife  
Colorado Forest Service  
Colorado Mined Land Reclamation Division  
Colorado State Historic Preservation Officer  
Colorado Water Conservation Board  
Utah Division of Wildlife Resources  
Utah Office of Planning & Budget (State Clearinghouse)  
Utah State Historic Preservation Officer  
Wyoming Department of Environmental Quality  
Wyoming State Planning Coordinator's Office

### **Organizations**

American Canoe Association  
American Horse Protection Assn., Inc.  
American Petroleum Institute  
American Wilderness alliance  
Audubon Society of Western Colorado  
Big Horn Jeep Club  
Club 20  
Colorado Cattlemen's Association  
Colorado Council of Professional Archaeologists  
Colorado Guides and Outfitters Association  
Colorado Historical Society  
Colorado Mining Association  
Colorado Native Plant Society  
Colorado Open Space Council  
Colorado Wildlife Federation  
Colorado Wilderness Network  
Colorado Wool Growers Association  
Environmental Defense Fund  
Environmental Policy Institute  
Friends of the Earth  
Grand River Institute  
Independent Petroleum Association of the Mountain States  
National Audubon Society  
National Organization for River Sports



## PUBLIC COMMENTS

National Wildlife Federation  
Natural Resources Defense Council, Inc.  
Nature Conservancy  
Northwest Rivers Alliance  
Rocky Mountain Oil and Gas Association  
Routt-Moffat Wool Growers  
Sierra Club  
Southwest Wyoming Industrial Association  
Wilderness Society  
Upper Colorado Environmental Plant Assn.  
Utah Mining Association  
Utah Wilderness Association  
Western Colorado Committee for Public Access  
Western Colorado Congress  
Wildlife Management Institute  
Wyoming Wildlife Federation

In addition, copies of the draft document were mailed to individuals on our RMP/EIS mailing list.

## LIST OF PREPARERS

**Roy S. Jackson**  
Area Manager, Little Snake Resource Area

**Glenn Sekavec**  
Assistant District Manager for Planning and Environmental Assistance

**Carol A. MacDonald**  
Team Leader

**Duane Johnson**  
Program Manager

**Terence R. Loyer**  
Planning Coordinator

**Beverly Kolkman**  
Editor

**Michael Albee**  
Wildlife

**David J. Axelson**  
Economics, Social Values

**Steve Bennett**  
Technical Coordinator (Natural History, Recreation, Cultural Resources, Wilderness, Economics, Social Values, Coal Unsuitability)

**David Cooper**  
Recreation, Wilderness

**John S. Denker**  
Threatened/Endangered/Candidate/Colorado BLM Sensitive Plant Species, Natural History

**Johnathan W. Dodt**  
Recreation

**Janet Hook**  
Coal Geology

**Gary Hoppe**  
Technical Coordinator (Wildlife, Threatened/Endangered/Candidate/Colorado BLM Sensitive Plant Species, Soils, Water Resources, Forestry)

**Marilyn K. Kastens**  
Soils, Water Resources

**Henry S. Keesling**  
Cultural Resources

**Russell W. Kraph**  
Soils

**Ole Olsen**  
Climate and Air Quality

**Mary M. Pressley**  
Writer/Editor

**Vernon O. Rholl, Jr.**  
Lands/Realty, Access/Transportation, Technical Coordinator (Geology, Mineral Resources, Air Quality), Cartographer

**Mary J. Ryan**  
Word Processor

**Greg Shoop**  
Oil and Gas

**Kelly L. Sparks**  
Technical Coordinator (Fire, Wild Horses, Vegetation, Livestock Grazing)

**Edwin M. Zaidlicz**  
Forestry, Recreation, Wilderness

## PUBLIC COMMENTS

### RESPONDENTS

#### List 1

#### Speakers at Public Hearings

Comment

Number Individual, Group or Agency

#### Denver, CO - March 10, 1986

A-1 Kirk Cunningham  
A-2 John Wade  
A-3 Eleanor Von Barga  
A-4 John Norton  
A-5 Tony Merten  
A-6 Tom Easley  
A-7 Connie Albrecht  
A-8 Doug Rebotham  
A-9 Rocky Smith  
A-10 Mary Boldt  
A-11 Susan Martin  
A-12 Dianne Andrews  
A-13 Dorothy Cohan  
A-14 M.P. Steinkamp  
A-15 Mike Figgs  
A-16 Dave Allured  
A-17 Earl Jones  
A-18 Robert Ripple  
A-19 Nicholas Brown  
A-20 Roger Fuehrer  
A-21 Gingy Anderson  
A-22 Linda Batlin  
A-23 Martin Walter  
A-24 Lawrence Papp  
A-25 Matthew Duhaime  
A-26 Joe McGloin  
A-27 Pam Hoge  
A-28 David Walder  
A-29 Rosalind McClellan  
A-30 Virginia Castro  
A-31 Tamara Wiggans  
A-32 Diane Witters

Comment

Number Individual, Group or Agency

#### Craig, CO - March 12, 1986

B-1 Tom LeFevre  
B-2 Mark Pearson  
B-3 Hugh Newton  
B-4 Sam Rinker  
B-5 Louise Miller  
B-6 Bob Lyons  
B-7 Ed Talkington  
B-8 Dean Visintainer  
B-9 Charles Sis  
B-10 John Randolph  
B-11 Wright Dickinson  
B-12 Dan Randolph  
B-13 Gerald Culverwell  
B-14 Rich Atkinson  
B-15 Dale Kruse  
B-16 Tom Kourlis  
B-17 Barry Smith  
B-18 John Peroulis  
B-19 Bill Agnew  
B-20 Mick Harvilla  
B-21 Wayne Sowards  
B-22 Mike Frazier  
B-23 Tom Beachman  
B-24 Conrad Zwanzig  
B-25 John Raftopoulos  
B-26 John Worthington  
B-27 Gary Tubman

#### Vernal, UT - March 13, 1986

C-1 Neal Domgaard  
C-2 Mike Goddard  
C-3 Will Durant  
C-4 Dave Kennell  
C-5 Stephen Borton

# PUBLIC COMMENTS

## List 2 Letters

Letter Number	Individual, Group or Agency
1	George Early, BLM Lands Foundation
2	David Simpson
3	Kirk Koepsel
4	Robert Fink, Advisory Council on Historic Preservation
5	R.P. Bloodworth
6	Glenn Gade
7	Jayne Fishburne
8	Paul Tosetti
9	Lorraine Lane
10	John F. Reed
11	Dusty Wright MacDougall
12	Steven M. Bortz
13	John Spezia
14	Richard A. Curtis
15	Joni Ellis
16	Mitchel W. Little
17	Mike W. Crosby
18	Janet Thew
19	Mark E. Udall
20	Lary Compos
21	Gloria Barron
22	Bruce Mohr
23	Rosemary Prindle
24	Bill Brooks
25	Randy Kennedy
26	Norm Mullen
27	Judy Capra
28	USDI, Bureau of Reclamation
29	David A. Hill
30	Mary L. Karner
31	Stan Ferris
32	Paul Rea
33	Virginia Castro
34	Harley Orahood
35	Todd Robertson
36	Nina and Arval Johnson
37	Cindy Taylor
38	Ben W. Thompson
39	James R. Guadagno
40	Mark Collier
41	Brad Cameron

Letter Number	Individual, Group or Agency
42	M.S. Rosser
43	Mike Peterson
44	Sam Rinker
45	Carol McCord Dix
46	Ronald Vick
47	Luke S. Erdoes
48	Robert Tubbs, Jr.
49	Will Durant, Uintah Mountain Club
50	Department of the Air Force
51	Diana Grunig
52	Chrystiane Wiederrich
53	Stephen Pomerance
54	Janna J. Harper
55	Lorraine Lane
56	Andrew McConkey
57	Steven Kelton
58	Elizabeth Atto
59	Carol P. Stewart
60	Clifton R. Merritt, American Wilderness Alliance
61	John M. Ritchey, Ft. Lewis College
62	David Lucas
63	William R. Haase
64	Larry Mehlhaff
65	Laurie Thayer
66	Pat Tierney
67	Gerald L. Culverwell
68	Jeff Nelson
69	Stella Marker
70	Frances W. Brown
71	Michele K. Whitaker
72	Del Owens
73	Thomas Patrick
74	Philip Ellgen
75	Jim Durham
76	Gary L. Thor
77	Tony Merten
78	Peter M. Robinson
79	Joseph J. Krieg
80	Nina Churchman
81	Robert E. and Thelma Tubbs
82	Bruce M. Stevens
83	Daryl Anderst
84	Jeanne Wylie Torosian
85	Dr. & Mrs. Glenn Cushman
86	Tina Gregory
87	Jon Sirkis

## PUBLIC COMMENTS

Letter  
Number Individual, Group or Agency

---

88 Eric Johnson  
89 Susan Kasprick  
90 William M. Folger  
91 Lynn Cudlip  
92 Lyle R. Moss  
93 USDI, National Park Service  
94 Thomas E. LeFevre, Moffat County  
Commission  
95 Jim Allard  
96 Ed Talkington  
97 Clay Johnson  
98 Mark Person, Sierra Club  
99 Sharyl Kinnear  
100 Garry L. Miller, Centennial Gold Corp.  
101 USDI, Bureau of Mines  
102 Robert P. Smith  
103 Susan Tucker  
104 Jeanne T. Hemphill  
105 USDI, Geological Survey  
106 Robert D. Brockhaus  
107 Henry G. Wright  
108 Sally J. Cole  
109 G.M. Barrow, Texaco  
110 Chris Seitz  
111 C.R. Cole  
112 James W. Thayer, Grand Mesa Boat Works  
113 Allen Moore  
114 Susan Schramm  
115 State of Colorado, Division of Wildlife  
116 Mark A. Brun  
117 Petition (10 signatures)  
118 Kirk Cunningham, Sierra Club  
119 Thomas F. Rome  
120 William Agnew, Trapper Mining Inc.  
121 Bruce Pendery  
122 Jane Kenyon  
123 John E. Covell  
124 Petition (64 signatures)  
125 R.L. Andersen, Amoco  
126 William L. Baker, University of Wisconsin,  
Madison  
127 Alice I. Frell, Rocky Mountain Oil and Gas  
Association  
128 M.M. Flesche, Chevron  
129 Teresa L. Platt  
130 Douglas and Catherine Halm  
131 Christopher W. Riley

Letter  
Number Individual, Group or Agency

---

132 Lawrence A. Papp  
133 Rick Hammel, American Motorcycle  
Association  
134 Michael J. Kellett  
135 Eldon Kuney  
136 Robert E. Schreiner  
137 Paul T. Petersen  
138 Dan Randolph  
139 Rosalind McClellan  
140 Paul Krabacher  
141 Thomas E. LeFevre, Moffat County  
Commission  
142 L. Gary Visintainer  
143 Judy Moffatt  
144 John C. Parks  
145 Kathy Hands  
146 Edward G. Horn  
147 Connie Albrecht  
148 Amy Brockhaus  
149 Hermina G. Kilgore  
150 Barbara W. Irwin  
141 Steamboat Motorcycle Club (86 signatures)  
152 R.G. Atkinson, Colowyo Coal Company  
153 David Alberswerth, National Wildlife  
Federation  
154 Dean Visintainer, Northwest Colorado Rancher  
Assoc.  
155 Northwest Terrain Tamers  
156 Moses Jochabed  
157 Steve Raftopoulos, The Routt-Moffat Wool-  
growers Assoc.  
158 U. S. Environmental Protection Agency  
159 Cathryn R. Clark  
160 Katharine K. Newton and Gerols S.  
Hollingsworth  
161 M.P. Steinkamp  
162 Stacy House  
163 USDI, National Park Service  
164 Michael Gregory, Sierra Club  
165 State of Utah Natural Resources, Wildlife  
Resources  
166 Ellen Eakins  
167 USDI, Office of Surface Mining  
168 John Eakins  
169 Garry L. Miller, Centennial Gold Corp.  
170 Susan S. Martin, Colorado Native Plant Society  
171 Diana L. Langdon

## PUBLIC COMMENTS

Letter Number	Individual, Group or Agency
172	Joseph G. Hall
173	Robert S. Clark
174	Susan S. Martin
175	Danni L. Langdon, Audubon Society of Western Colorado
176	Kenneth R. Bevis
177	Dave Pendery
178	Kathy L. Towner
179	William L. Armstrong, U.S. Senate
180	Nicholas Brown, University of Colorado Wilderness Study Group
181	Michael L. Strang, House of Representatives
182	Lydia Garvey
183	State of Colorado, Department of Natural Resources
184	Robert F. Mueller
185	Roland Fischer, Colorado River Water Conservation District
186	Albert E. Camilletti, Moffat County Commission

A

U. S. DEPARTMENT OF INTERIOR  
BUREAU OF LAND MANAGEMENT

PUBLIC HEARING  
ON

DRAFT LITTLE SNAKE RESOURCE MANAGEMENT PLAN  
ENVIRONMENTAL IMPACT STATEMENT  
AND WILDERNESS TECHNICAL SUPPLEMENT

March 10, 1986  
7:00 p.m.

Poethills Ramada Inn  
11595 West 6th Avenue  
Denver, Colorado

PANEL

CRAIG DISTRICT - BLM  
455 EMERSON STREET  
CRAIG, COLORADO 81625

DONNIE SPARKS - Presiding Officer, District Manager, BLM, Canon City.

BILL PULFORD - Craig District Manager, BLM

GLENN SEKAVIC - Chief of Planning and Environmental Assistance in the Craig District

DUANE JOHNSON - Program Manager for the Little Snake RMP/EIS

GREG GOODENOW - Program Manager for the Wilderness Technical Supplement

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I N D E X

<u>SPEAKERS:</u>	<u>PAGE:</u>
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John Norton	28
Tony Martin	29
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Connie Albrecht	33
Doug Rebotham	36
Rocky Smith	38
Mary Boldt	42
Susan Martin	43
Dianne Andrews	47
Dorothy Cohan	50
Werna Steinkamp	51
Mike Figgs	53
Dave Allured	53
Earl Jones	55
Robert Ripple	56
Nicholas Brown	58
Roger Fuehrer	62
Gingy Anderson	65
Linda Ballin	68
Martin Walter	69
Lawrence Papp	73
Matthew Duhaime	74
Joe McGloin	77
Pam Hoge	79
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P R O C E E D I N G S

MR. DONNIE SPARKS: Good evening, ladies and gentlemen. I think we will go ahead and start. Although there's a few people still signing in, we'll go ahead and start with the introductory material and continue to sign in as you come in.

My name is Donnie R. Sparks. I'm the District Manager for Canon City, Colorado. I will be the presiding officer at this hearing.

This public hearing is for the United States Department of Interior, Bureau of Land Management to receive information and comments on the adequacy of the Draft Little Snake Resource Management Plan and the Wilderness Technical Supplement to the Resource Management Plan. Copies of these documents are available in the back of the room on the table where you signed in.

Most of you undoubtedly signed the attendance sheet as you came in the room. However, if you've not done so, I would ask you to sign now. If you plan to make a statement, be sure to check the appropriate space on the attendance sheet so we can add your name to the list of speakers.

The official reporter, seated behind me and to my right now, is Scott Ford, of the Federal Reporting Service, Incorporated. He will prepare a verbatim transcript of

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everything that is said at this hearing. If you wish to obtain a copy of the transcript, you should make your own arrangements with him.

A hearing panel has been designated to receive your comments. They are at the table in front of me: Bill Pulford, the Craig District Manager; Glenn Sekavic, Chief of Planning & Environmental Assistance in the Craig District Office; Duane Johnson, Project Manager for the Little Snake Resource Management Plan and EIS; and, Greg Goodenow, Program Manager for the Wilderness Technical Supplement.

This hearing panel is here to make sure that we clearly understand your comments. To achieve this, the hearing panel members or I may ask clarifying questions at the end of each speaker's remarks. These questions should not be interpreted as expressions of any predetermined position of the person asking the question or the Bureau of Land Management or of the Department of Interior. We simply want to make sure that we understand what the comments are and the points you are trying to make.

At this time, I will formally call the public meeting to order. This hearing is designed for you to give us your information and comments on the document including the wilderness recommendations, the adequacy of analysis, data or methodologies in the documents, and the merit of

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the alternatives considered in the plan. Your comments about the document and the management of the resources within the Little Snake Resource Area will be carefully and fully considered in the development of the final Resource Management Plan and Environmental Impact Statement. The final document will include a record of public comments, responses to substantive comments on the adequacy of the draft plan, and any modifications or corrections to the plan. The record of these hearings will accompany the Colorado State Director's recommendations on wilderness to Washington for consideration by the Bureau of Land Management, the Secretary of Interior, the President, and the Congress.

This hearing is not a debate or a question and answer session. Therefore, I will allow no questions, debate, or cross examination between the participants. If you have questions about the Little Snake Resource Management Plan or the Environmental Impact Statement or the Wilderness Technical Supplement, we will have BLM personnel available after the meeting and we'll try to answer your questions and provide you with information that will help you to prepare any written comments that you may have.

Now, I will ask Duane Johnson to present a brief overview of the Draft Little Snake Resource Management Plan

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and the Environmental Impact Statement. And, then, Greg Goodenow will follow with a brief overview of the Wilderness Technical Supplement.

MR. DUANE JOHNSON: Good evening. First, on the wall over here, we have alternative maps. These alternative maps are out of the RMP. Over here, we have overlays which depict the management priority areas of the Preferred Alternative. I realize they're kind of hard to see. So, after the meeting if you'd like to look at them or have any questions, we'll be available.

The Little Snake Resource Management Plan is designed to become a comprehensive plan. When implemented, it will establish land-use priorities for specific areas within the Little Snake Resource Area. The Little Snake Resource Area contains 1.3 million surface acres administered by the BLM and an additional 1.1 subsurface federal mineral estate acres. The RMP will provide a general framework for management to make future on-the-ground decisions. It is not intended to make finite, specific decisions for individual resources, rather it is designed to provide overall multiple-use objectives and management direction for the resource area.

The initial step of this planning process was to identify "issues" affecting public land management. The issues identified from our scoping meetings were:

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1. Determination of Suitability of Certain Areas for Mineral Development.
2. Management of Ecological Factors, Including Vegetation to Best Meet Livestock, Wildlife, Wild Horse Needs, and Demand for Woodland Products.
3. Determination of Need for Special Management Considerations.
4. Determination of Needed Realty Actions.
5. Determination of Access and Transportation Needs.

Alternatives were formulated. These alternatives were developed to provide a variation of management opportunities from these favoring resource protection to those favoring resource development. Current Management of the No Action alternative was first. It was the continuation of existing management policies, plans, and practices. Energy and Minerals alternative with emphasis on the production and development of energy and other mineral resources. Commodity Production, emphasis on mineral and livestock production from public lands. Renewable resources, emphasis on the management and production of renewable resources. National Environment, emphasis on protection and enhancement of the natural environment and resources of substantive scientific interest.

From these, a Preferred Alternative was

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developed. The following factors were considered in developing the alternative:

1. Principles of multiple use and sustained yield as set forth in the Federal Land Policy Management Act and other federal laws and regulations.
2. Relative significance of public land products, services, and uses to local and other economics.
3. Present and potential uses of public land.
4. Long-term benefits and adverse impacts versus short-term benefits and adverse impacts.
5. Impacts of uses on adjacent or nearby nonfederal and nonpublic land surface over federal owned mineral estate.
6. Relative scarcity of the values and availability of alternatives.

The objectives of the Preferred Alternative was:

1. Attempt to balance conflicts among other resources.
2. Incorporate necessary constraints to protect resources from decline.

The following are Management Actions resource by resource from the Preferred Alternative:

1. Coal - 638,808 acres would be acceptable for further consideration for federal coal leasing. This amounts to approximately 5.8 billion tons of

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1 coal.

- 2 2. Oil and Gas would be allowed with restrictions to
- 3 protect other resources.
- 4 3. Livestock Grazing - long term forage availability
- 5 would be 163,493 AUMs. If short-term adjustments,
- 6 which would be 148,821 AUMs, are initiated and
- 7 long-term management practices are developed,
- 8 preference will be restored to within 2% of the
- 9 original stocking rates.
- 10 4. Wildlife Habitat on public land - forage would be
- 11 available for 61,000 mule deer, 18,400 elk, 7,500
- 12 Pronghorns, and 70 bighorn sheep. BLM would
- 13 continue to coordinate with the Division of
- 14 Wildlife.
- 15 5. Threatened and Endangered and Sensitive Plants -
- 16 designate areas as Resource Natural Areas to
- 17 protect these plants.
- 18 6. Soil and Water Resources - protect fragile soil
- 19 and water areas through special performance
- 20 standards.
- 21 7. Forest Land and Woodlands - existing 10 year
- 22 forced management plans would continue for Diamond
- 23 Peak/Middle Mountain and Douglas Mountain.
- 24 Commercial forest lands would be managed on a
- 25 sustained yield basis.

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- 1 8. Fire Management. A Fire Management Plan would be
- 2 developed for the Little Snake Resource Area.
- 3 9. Wilderness - recommend Diamond Breaks for
- 4 wilderness designation. Do not recommend the
- 5 following WSAs for wilderness designation: West
- 6 Cold Springs, Cross Mountain, Ant Hills, Chew
- 7 Winter Camp, Peterson Draw, Vale of Tears, Teepee
- 8 Draw.
- 9 10. Natural Areas - designate the following sites as
- 10 special areas: Limestone Ridge RNA (1350 acres);
- 11 Irish Canyon ACEC (including Ink Springs RNA)
- 12 (11,680 acres); Lookout Mountain ACEC (6500
- 13 acres); Cross Mountain Canyon ACEC (3000).
- 14 11. Recreation - the following areas would be manned
- 15 as recreational areas: Irish Canyon ACEC
- 16 (12,280); Little Yampa Canyon/Juniper Canyon
- 17 (19,840); Cross Mountain (13,000 acres), which
- 18 would include the Cross Mountain ACEC: Cedar
- 19 Mountain (880 acres); Cold Springs Mountain
- 20 (27,600 acres).
- 21 12. ORV Designation - manage for either open, limited,
- 22 or closed depending on the area.
- 23 13. Paleontology - develop a program to inventory,
- 24 classify, and designate, and monitor resources.
- 25 14. Rights of Way - no designated corridors.

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- 1 15. Access, Boundary Markings, and Road Requirements -
- 2 prepare an activity plan for access and
- 3 transportation.

4 The RMP/EIS was printed and available to the  
 5 public for view in February, 1986. The public has 90 days  
 6 in which to review the draft document and provide comment.  
 7 Any comments will be addressed in the final RMP. The draft  
 8 document will then be modified, if necessary, and a final  
 9 RMP/EIS will be printed and provided to the governor for  
 10 consistency review in early September of 1986. This  
 11 document will, also, be available to the public in  
 12 September. The final document will not be a reprint of the  
 13 draft, unless necessary, but will be a document with  
 14 comments and responses. The Craig District Manager and the  
 15 Little Snake Resource Area Manager will then prepare a  
 16 Record of Decision. The Record of Decision is scheduled to  
 17 be available in early 1987. The final RMP/EIS and Record  
 18 of Decision will contain BLM's final decision for the  
 19 proposed areas. Thank you.

20 MR. GREG GOODENOW: My name is Greg Goodenow.

21 I'm the Project Manager for the Wilderness Technical  
 22 Supplement. We have several maps here tonight. Across the  
 23 back of the room, the USGS Quads that show the approximate  
 24 boundaries of the Wilderness Study Areas. The same maps, I  
 25 reproduced in the Wilderness Technical Supplement. Also,

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1 up front here, after the meeting if you have questions, we  
 2 have a general location map that shows private surface,  
 3 state surface, federal surface, and also private and state  
 4 mineral and federal mineral rights for each of the eight  
 5 WSAs we're considering.

6 The Wilderness Technical Supplement which is  
 7 available at the back table contains a summary which  
 8 highlights many of the impacts. It contains a purpose and  
 9 needs section which will explain our Wilderness Study  
 10 Process in more detail than I am tonight, description of  
 11 the alternatives and management actions under each of those  
 12 alternatives in much more detail, and a summary of the  
 13 impacts of each of those alternatives. The Wilderness  
 14 Technical Supplement analyzes the impacts of designating or  
 15 not designating eight Wilderness Study Areas, or WSAs, as  
 16 wilderness. Alternatives analyzed include designated all,  
 17 some, or none of each WSA as wilderness. Each WSA is  
 18 analyzed individually in cites specifically. The  
 19 Wilderness Study Areas are managed by the Bureau of Land  
 20 Management, or BLM, as part of the Craig District's Little  
 21 Snake Resource Area in northwest Colorado. This analysis  
 22 and the analysis in the Wilderness Technical Supplement is  
 23 intended to be used in conjunction with the Little Snake  
 24 RMP and supplements that analysis.

25 The Bureau of Land Management's Wilderness



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Program is a result of the Federal Land Policy and Management Act, or FLPMA, of 1966. Two sections of this law apply, Section 603 and Section 202. This is important for you to understand our process in that while the analysis is the same, under these different authorities, the decision process is a little different.

Section 603 of FLPMA directs the Secretary of the Interior to review public land areas of 5000 acres or more determined to have wilderness characteristics. The Secretary then recommends to the President the suitability or non-suitability of each area for preservation as wilderness. The Congress will ultimately decide whether to designate or not designate the areas as wilderness. The West Cold Spring, Diamond Breaks, and Cross Mountain Wilderness Study Areas are being studied under the authority of this section of FLPMA.

Section 202 of FLPMA provides authority through the land-use planning process which is the RMP process to study and recommend as wilderness areas, areas not covered under Section 603. While the study process is the same, if the BLM Colorado State Director determines that the areas are not suitable for wilderness designation, he can drop them from further consideration. This would be done in the final land-use plan decision. If they are found suitable, Congress must make the final decision to designate or not

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designate them as wilderness. Five WSAs, Ant Hills, Chew Winder Camp, Peterson Draw, Teepee Draw, and Vale of Tears are being studied under this authority.

While eight WSAs are located in BLM's Little Snake Resource Area, Craig District in western Moffat County, two of the WSAs, West Cold Spring and Diamond Breaks, extend to the Bureau of Land Management's Diamond Mountain Resource Area, Vernal District in Dagot County, Utah. They total 90,887 acres.

BLM has developed a wilderness review process consisting of three phases: inventory, study, and reporting. The inventory phase involved identifying the public lands that contain wilderness characteristics established by Congress. Quote, "A Wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain." The inventory phase was completed in Little Snake Resource Area in November of 1980. Eight WSA's were found to contain the wilderness characteristics, the eight that we have discussed in the document tonight and that there are maps of.

The study phase recommends WSAs as suitable or nonsuitable for wilderness designation. Based on FLPMA,

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BLM must determine whether an area is more suitable for wilderness designation or more suitable for other uses considering all values, resources, and uses of the public land. The study phase for wilderness includes four major steps: issue identification, application of planning criteria and quality standards for analysis and documentation, formulation of alternatives, and evaluation of the environmental consequences. All these steps are discussed in more detail in the document. Issues were identified both nationally and locally through the RMP process. The planning criteria and quality standards are presented on Page S-2 of the Wilderness Technical Supplement in the Summary.

Alternatives were developed which looked designating all, some, or none of each WSA's wilderness. These options correlate to the all wilderness, conflict resolution, and no-action, no-wilderness alternatives. The no-action alternative allows for development under multiple use, while the no wilderness alternative protects each area's potential for backpacking, hiking, and non-motorized forms of recreation, but does not recommend designation.

The fourth step of the study process is an analysis of the environmental impacts of the alternatives. A detailed analysis for each WSA is included in the

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document for resources which may be impacted by designation or nondesignation.

Both the draft and final analysis will be prepared. Comments on this Wilderness Technical Supplement and on the Draft Little Snake Resource Management Plan will be used to prepare the Preliminary Final Impact Statement and the Wilderness Study Report. When the Preliminary Final Environmental Impact Statement and the Wilderness Study Report are approved, the study phase will be completed.

The five Section 202 WSAs may be dropped from further consideration for wilderness by the Colorado State Director through BLM's land use planning process.

The final part of the Wilderness Review Process for BLM is reporting. Upon completion of the study, final recommendations as to whether the WSAs are suitable or nonsuitable for designation as wilderness will be made by BLM through the Secretary of the Interior to the President. This recommendation will include a mineral survey, which will be conducted by the U. S. Geological Survey and Bureau of Mines. Again, this process does not apply to any Section 202 WSAs found to be nonsuitable by the Colorado State Director.

Congress has the sole authority for designating any federally administered land as wilderness. Congress

will take the recommendations submitted by the President along with any information it may have obtained through its own sources and will pass legislation that would formally designate WSAs as wilderness or release them for uses other than wilderness.

All eight WSAs are currently managed under BLM's Interim Management Policy and Guidelines for Lands Under Wilderness Review and maintain their suitability for preservation as a wilderness. The three Section 603 WSAs will continue to be managed under the inner management policy until Congress either designates them as wilderness or releases them for other uses. The five Section 202 WSAs will be dropped from interim management if the Colorado State Director determines that they are nonsuitable for wilderness designation. If the State Director determines they are suitable, they will remain under the Interim Management Policy until Congress decides whether or not to designate them as wilderness. As long as a WSA remains under the Interim Management Policy, the Bureau of Land Management will maintain the WSA's suitability for preservation as wilderness.

Based on the results of the analysis in the Wilderness Technical Supplement and additional analysis in the Little Snake Resource Management Plan, the following preliminary findings have been presented for public view

and comment before preparation of a final document.

Diamond Breaks is recommended as suitable for inclusion in the national wilderness preservation system. West Cold Springs and Cross Mountain WSAs are not recommended as suitable for inclusion. Ant Hills, Chew Winter Camp, Peterson Draw, Tepee Draw, and Vale of Tears WSAs are not suitable for inclusion in the national wilderness preservation system and will be dropped from further consideration.

Again, as is mentioned in the cover of the documents and was mentioned earlier, comments will be accepted through May 9, 1986.

MR. SPARKS: If there is anyone that came in late and didn't get a chance to sign up, this would probably be a good time to go ahead and do that.

To insure that a complete and accurate record of the hearing is made, only one person should speak at a time and everyone should remain as quiet as possible while the hearing is in progress. During the hearing, no one will be recognized other than the designated speaker and members of the hearing panel. Any elected officials present who wish to make a statement will be called on first. Other speakers will then be called in the order in which the requests to speak have been received. To assist the reporter, please, state your name, address, and who you are

representing. If you're representing an organization, indicate that. If you're representing only yourself, then, indicate you're representing yourself. It would be helpful if you would give the reporter a copy of any prepared statement you might have. If you have an extra copy, please, give it to him just prior to your presentation.

All individuals are expected to confine their remarks to five minutes or less, however it works out for you. This time limitation will be enforced so that everyone can be given an opportunity to speak. If time is available at the end of the hearing, individuals who are unable to complete their testimony will be given the time to do it then. They will be called in the same order as originally called. I will try to give each of the speakers an indication when you have one minute left to complete your remarks.

Written comments will be accepted in lieu of oral presentations or as a supplement to your oral presentation. All comments will be given the same amount of consideration. They should be submitted during the course of the hearing or at any time on or before May 9, 1986. If written comments are not submitted today, they should be addressed to the Little Snake RMP Project Manager, Bureau of Land Management, Craig District Office, 455 Emerson Street, Craig, Colorado, 81625. This address can be found

on the inside front cover of the Draft Resource Management Plan or in the Wilderness Technical Supplement.

The transcript of this hearing will be available for public inspection at various BLM offices: the Colorado State Office in Denver; the Craig District Office and the Little Snake Resource Area Office, both in Craig; the Vernal District Office in Vernal, Utah; and, the Utah State Office in Salt Lake City, Utah. The transcript will be available at these locations approximately 25 days after the hearing.

If there are any questions on hearing procedure, we will answer them now.

(No audible response.)

MR. SPARKS: Okay. If there are no more questions, we are now ready to receive your presentations. Please, begin your oral statement by stating your name, address, and organization you represent. Our first speaker will be Kirk Cunningham.

MR. KIRK CUNNINGHAM: My name is Kirk Cunningham. My address is 680 Tantra Drive in Boulder, 80303. I'm representing mostly myself here tonight. I'm, also, the Conservation Chairman for the Sierra Club in Colorado, so I will make a few comments on that group's behalf. However, the official comments, most of them at least, for our group will be made by Mark Pearson or Cheryl Kanier at your

hearing out on the western slope.

As far as the wilderness recommendations are concerned, we are disappointed, of course, that the BLM has decided not to recommend most of the areas for wilderness. In particular, I have personally visited both Diamond Breaks and Cross Mountain several times and I certainly support your recommendation for Diamond Breaks wholeheartedly. Cross Mountain, in particular, I think, a bad break from your recommendations. I think it deserves much better than that. Vale of Tears is an area I'm somewhat familiar with, at least from a distance, and also West Cold Spring has a reputation among people that I know as an excellent area for wildlife viewing.

Just a few other comments about some aspects of the plan. Aside from wilderness, one of the things that we're concerned about in the area is the management of soil and water resources because I think the Draft Plan and EIS make clear that this is a critical problem in the area or, at least, in the western part. I wanted to make two small comments with respect to management of these resources which I have just gotten to understand just recently. The BLM up in Baggs, Wyoming, or in that management area up around there has been doing a study along with University of Wyoming on the introduction of beaver into stream channels as a means of soil and repairing and zone

restoration. I only saw one small mention of this in your document and I would like you to consider it more carefully if you can because it has the advantage of being both cheap and effective if this research is to be believed. Another thing I would like you to consider is a type -- some experimentation, at least, if nothing more, on some alternative grazing methods in your district. The Grand Junction District has such an experimental program under what's called the Savory System and if there are willing operators in your area, I would certainly recommend that.

In general, I think that the Draft Environmental Impact Statement paints a pretty grim picture of the declining resources in this area. It seems that all the natural indicators are going down rather than up or even remaining level. I don't think -- my own personal opinion of this is that the BLM's proposed plan does not do enough to maintain the resource, let alone improve it. It seems to me that the national environment alternative is a closer approximation to what would really protect a resource.

Finally, let me say that the recent memo from Secretary Rodell's office has indicated the importance of involving volunteer groups in various types of cleanup work and whatever needs to be done in public lands. I would certainly like to let you know that the Sierra Club and I'm sure other environmental groups are interested in helping

to the extent that they can in any effort to improve environment in your resource area through volunteer efforts. Thank you.

MR. SPARKS: John Wade?

MR. JOHN WADE: I'm John Wade from Pueblo, 220 West 15th Street, 81003. I speak as the Conservation Chair of the Pueblo group of the Colorado Mountain Club and, although not officially their representative, to some extent for the Conservation Committee of the Colorado Mountain Club statewide as a part of it and, in turn, it's a member of the Colorado Environmental Coalition.

Since I had expected to be in a water law class tonight instead of here, I have not made the thorough study that I might have, but I speak as one of the many eastern slope people who are concerned about the resources of the western slope and am particularly disappointed that Cross Mountain was not recommended for wilderness status. It seems to me that at least part of the reasoning why it was not relates to oil and gas and all that I can gather is that, at least, -- exploration doesn't indicate that much likely oil and gas to be there. And, even so, it's a very small part of what's available in oil and gas resources there.

On the more positive side, as population increases and there are more people looking for outdoor

recreation, we need to be preserving areas of significance, such as Cross Mountain, so that all areas will not be overcrowded and over-used and so that not only the mountains and canyons, but the wildlife and other features may be preserved. I'm thinking of ecological diversity of the species that are endangered or, if not strictly on the endangered species list, are scarce. Thinking of the positive features of that mountain area, there is kayaking, hiking in season, and the ability to view falcons, eagles, big horn sheep, and a lot of other game and wildlife that you would have difficulty seeing as readily.

I cannot speak as well in the other areas. I would think that more than just Cross Mountain ought to be recommended, but that's the one I am particularly concerned about and disappointed that it was not recommended.

MR. SPARKS: The next speaker will be Eleanor Von Borgen.

MS. ELEANOR VON BARGEN: My name is Eleanor Von Borgen and I live at 5555 East Yale in Denver, Colorado, 80222, and I'm the President of the Colorado Native Plant Society and wish to make a statement on their behalf. We thank you for the opportunity that we have tonight to comment on the Draft Little Snake Resource Management Plan.

The Colorado Native Plant Society will submit more detailed written comments on the RMP. So, this

evening, I shall merely outline briefly our impressions naturally focusing on the RMP's provisions relating to plants.

First, we recognize and appreciate the considerable effort and care that has gone into the preparation of this plan. Specifically with respect to the plant resources, we appreciate the fact that a capable trained BLM botanist was involved both in the inventories and surveys of the plant resources of the Little Snake area and in preparation of this document. This botanical expertise together with information provided by other botanical scientists is reflected in the listing in the RMP of 23 "BLM Sensitive" plant species, together with two other plants that are federal candidates for listing as endangered species. Obviously, the Little Snake Resource Area contains many plants and plant communities that are of special interest to the scientific community. The Colorado Native Plant Society strongly supports protection and preservation of these uncommon botanical resources which represent important components of our nation's national heritage.

We are pleased that the Preferred Alternative proposes designation of Limestone Ridge as a Research Natural Area, and of Irish Canyon, Lookout Mountain, and Cross Mountain Canyon ACECs. We are aware of the important

plant values for each of these sites and, therefore, the Colorado Native Plant Society fully supports designation of each of these proposed Special Management Areas.

We wish to request, however, that Special Management Area designation be proposed in the final RMP for four other sites, totaling only about 1,525 additional acres. We note that each of these four sites, Ink Springs, G-Gap, Horse Draw, and Hells Canyon, was indicated as a possible Special Management Area under one or more alternatives, but that they were omitted from the Preferred Alternative recommendations for SMAs. We are puzzled, in particular, by the fact that Ink Springs was proposed for RNA designation in all of the other alternatives except, of course, current management, yet was not so proposed in the Preferred Alternatives. Although we realize Ink Springs is included in the Irish Springs ACEC, as delineated in the RMP, it seems to us logical that any site proposed for RNA designation under the alternatives most oriented toward resource development, also should receive such designation under the Preferred Alternatives. It is not necessary to take time here to review the important plant resources within the Ink Springs site, as they are well summarized in Appendix 22 of the RMP. The Colorado Native Plant Society wants to reiterate, however, its concern for an interest in the rare plant associations that are of special concern not

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only to our state, but also are an importance nationally and globally. The Ink Springs site is one such example and we urge that it be protected as an RNA. For the same reasons, we likewise request and urge that G-Gap and Horse Draw be designated RNAs and that Hell's Canyon be designated an ACEC. We, also, wish to point out that the protective measures outlined in the Preferred Alternative for those sites specify "avoidance stipulations for remnant plant associations...", but do not specify such provisions for the sensitive plant species known to occur on each of these sites.

Similarly, the Colorado Native Plant Society urges adequate protective measures to maintain the very special plant associations found within three other sites; Ace In The Hole, Vermillion Bluffs, and Vermillion Creek Falls. We appreciate that the RMP specifically recognizes and describes the values within these areas and the intent to insure their continued survival and to protect them by administrative means. We ask that this intent be clarified by inclusion in the final RMP of specific fencing provisions to protect these areas from livestock grazing.

Thank you for your consideration.

MR. SPARKS: Does the panel have any questions?  
(No audible response.)

MR. SPARKS: The next speaker will be John

Norton.

MR. JOHN NORTON: My name is John Norton. I live 1818 East 24th Avenue, Denver, 80205. It seems to me like this is all boiling down to straight economics. When you get down to it, the benefits of wilderness are just as tangible and real as the benefits of oil and gas exploration. The only problem is these benefits aren't traded on the open market. But, like I say, nevertheless, it doesn't make them any less real. As the supply of public land available for wilderness decreases, it's value increases just like anything else. Given the fact that there seems to be little oil and gas potential in these Wilderness Study Areas and with so much available around them, it seems to me like we would be wasting a viable resource in not designating this as wilderness.

I want to commend the BLM on Diamond Breaks designation and hope that you include the others, especially Cross Mountain in your considerations. Thank you.

MR. SPARKS: Yeah, does the panel have questions?

MR. GLEN SEKAVIC: I have a question, yes. You spoke of the oil and gas potential in the Wilderness Study Areas. Do you have information that would facilitate us coming up with a more definitive -- value whatever that might be?

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MR. NORTON: No, I don't, personally.

MR. SEKAVIC: Okay. Do you know where we may be able to supplicate the information that we have?

MR. NORTON: No, I don't.

MR. SPARKS: Are there any other questions?  
(No audible response.)

MR. SPARKS: Thank you. The next speaker will be Tony Martin.

MR. TONY MARTIN: I didn't finish writing my statement so I'm not -- my name is Tony Martin. I live in Post Office Box 261112 in Lakewood, Colorado. I'm representing myself tonight. However, I do belong to several environmental organizations and including Earth First. My remarks will basically address the economic issues of the RMP.

It is clear after reviewing Chapter 3, economics paragraphs that BLM has placed a disproportionate emphasis on mineral extraction and resource exploitation in Little Snake. BLM has subverted the concept of multiple use. For example, of six proposed management alternatives, four including the so-called Preferred Alternative, lean heavily toward production and development which are synonymous with plundering the land. As a further example, grazing is authorized on 97% of federal lands in Little Snake and livestock products generate 17.5 million dollars in revenue

in Routt and Moffat Counties. Yet, hiking, camping, fishing, sight seeing, white water rafting, backpacking, skiing, and hiking generated 43.7 million dollars during the same period of time. I am outraged that the primary beneficiary of Little Snake landscape is the cow.

The paragraphs on economics in the RMP explain that the economic base of Routt and Moffat County is as mining, agriculture, and trade. Yet, nowhere in the chapters in economics did I find any kind of analysis about just how much mineral worth was there, what percentage it represents of the national mineral wealth available, how much it would cost to extract that mineral wealth, how much it would cost taxpayers in subsidies just like the subsidies taxpayers pay to support grazing in Moffat and Routt Counties, and so on. I read that several millions of dollars of revenue are generated each year from the mineral and livestock activities, but I did not read how much of my taxpayer money goes into subsidizing what is perceived nationally to be a bunch of welfare ranchers in Routt and Moffat Counties.

I want to close my remarks by asking that BLM re-evaluate their position on assigning wilderness lands in Routt and Moffat Counties. As the gentleman spoke before me, there is just as much value, if not greater value, in having wilderness as a resource as there is in destroying

what wild lands remain in this good country, United States. Thank you.

MR. SPARKS: Are there any questions?  
(No audible response.)

MR. SPARKS: Thank you. Our next speaker will be Tom Easley.

MR. TOM EASLEY: My name is Tom Easley. I live at 1585 South Steele Street in Denver and I'm representing myself here tonight. And, I guess, I should start out by saying that while I live in Denver now, I lived in northwest Colorado for about 10 years and became very familiar with a lot of the lands you're talking about in this plan. And, I especially became fond of the Wilderness Study Areas that are included within the plan and I think it's pretty amazing that out of the eight study areas, you'd only come up with one recommendation for a wilderness. And, I base this opinion on my own experience in wilderness areas around northwest Colorado. I feel myself to be very fortunate in living around some of the finest wildlands in Colorado for 10 years in the National Forest around Steamboat Springs. But, to me, those areas cannot compare to the Wilderness Study Areas that are in the Little Snake Resource Area. These places are really truly wilderness where you don't run across a lot of people with high tech backpacking gear and so forth. You're

really out there in the wilderness. So, I find it incredible that you're only talking about Diamond Breaks which, of course, deserves it, but so do Cold Springs Mountain and Cross Mountain -- Cross Mountain, especially, and the Dinosaur contiguous areas.

To add to that, I also became very much aware of the values of the last free-flowing river essentially in Colorado, the Yampa River. And, I'm encouraged to see that you are talking about a special management provision for the Juniper Canyon there. But, I, also, understand that there is a strong possibility that the one end of that Special Management Area might be given up for coal development right next to the river. And, to me, this again is very amazing considering the amount of coal resources around the area and, to me, that you're not talking about a good sense of balance when you give up some of those last wildlands and really degrading one of the last free-flowing rivers in the state.

So, I would urge a more balanced view of the resource, the wildlife resource, the wildlands resource, and the natural free-flowing river resource when you get around to making it up for final plan. Thank you.

MR. SPARKS: Does the panel have any questions?  
(No audible response.)

MR. SPARKS: Okay. Thank you. Our next speaker

will be Connie Albrecht.

MS. CONNIE ALBRECHT: I'm Connie Albrecht. I work for Friends of the Earth and I'm here tonight representing that organization. The P. O. Box is 728, Palisade, Colorado, 81526.

I've done a preliminary scan of this RMP and I have looked at a number of other RMPs that have come out from the BLM districts. In some ways, I think this, you know, has some things to recommend. In comparison to the other RMPs, I think you did more, for example, as far as emphasis on soils and vegetation, than did some of the other RMPs. However, there are still some very similar problems in this RMP, as I've mentioned in comments on other ones. And, I'll run through a couple of general problems I see with this in our preliminary analysis.

One, there's no designation of corridors and just simply putting a few areas off limits to corridor development is not sufficient. Also, on this issue, the other adjacent resource areas have been doing corridor designation and it's going to look a little odd when you have a corridor coming to one boundary and, then, stopping and, then, from then on out, it's open when you go into the Little Snake area. So, I think, you really should go back and look at designating corridors and having those match up across the areas.

On oil and gas leasing, our contention has always been that having no surface occupancy stipulation is simply not sufficient to protect special resources in the area. And, that includes some of the rare and endangered plants, as well as some of the other riparian and recreation lands in the area. The stipulations aren't always enforced and they simply don't go far enough in protection.

I would like to incorporate by reference the recommendations that the Colorado Native Plant Society offered because I'm, also, a member of the Plant Society and I was disappointed that there weren't more ACECs and other management considerations given to the plant resources in the area.

On grazing, I found it rather odd that given that the -- is the most extensive use in this area that there wasn't more attempt made at analysis of problems associated with grazing and trying to balance grazing with some of the other resources in the area. I'm not trying to run any of the ranchers in that area out of business, but I do think we have to look at their needs and their use of the land and have it balanced with some of the other resources. For example, on grazing, one of your charts showed that many of the allotments, you don't even know what the status is. You don't even know what the condition is of the range in those allotments. So, on the basis of the majority of the

allotments, you have an unknown status. How can you possibly have done an assessment and, then, on that basis decided the recommended treatments you have in there? And, you have some very specific treatments recommended for the range and I think there's an issue here of who is subsidizing treatments and whether those treatments are designated for special ranchers or particular ranchers or if they've really been done on the basis of some assessment. And, I think that's a question this RMP is going to have to answer. And, you did not look at alternative methods either, in terms of grazing management.

The last issue I'd like to speak to and it's our concern about the Yampa River. We've always supported wild and scenic designation for the Yampa. It's very special, as Tom Easley mentioned, because of its -- you know, it is the last free-flowing tributary of the Colorado. And, it certainly deserves more protection than what it is offered in this Draft RMP. And, I will be looking at that more closely and probably submitting more specific comments on what we think should be done, as far as protection. It, also, does have habitat for some endangered fish species and I think that the BLM should be talking to the Fish & Wildlife Service and the work that's been going on with the Upper Basin Coordinating Committee and some of this area in the Yampa has been designated Priority 1 habitat for the

squawfish and humpback chub. And, whatever protections you have that come out of this RMP should be done in coordination with that group and their recommendations. And, as far as those species, I think we have to, you know -- the Yampa is a popular recreation area, but we have to also balance the recreation use against protection of species. Any questions?

(No audible response.)

MR. SPARKS: Thank you. Our next speaker will be Doug Rebotham.

MR. DOUG REBOTHAM: Thank you. My name is Doug Rebotham. My address is 360 Humboldt Street in Denver, 80218. And, I'd like to address the conclusions in the Wilderness Technical Supplement and specifically its failure to recommend the Cross Mountain WSA for legislative protection under the Wilderness Act.

But, first off, I'd like to maybe reiterate what Tom Easley said about the wilderness qualities in the Cross Mountain area. In my single visit there, I found them just unmatched and truly spectacular and worthy of legislative protection.

Secondly, I'd like to mention my concern that the BLM, with all due respect, is excessively territorial in its management policies. And, none of the agencies issued priorities. Is this territoriality better illustrated than

in the area of wilderness recommendation? Although the BLM has promulgated a large number of innovated special emphasis in management areas, virtually all are administrative in nature and do not require any Congressional action. Such is the case with wilderness, which can be designated only by Congress and within which management actions are strictly defined by law. Because wilderness legislation severely limits the BLM's control of public lands, there seems to me to have been a demonstrable tendency within the agency to reduce the acreage that Congress will review for wilderness designation. As an example of this, the San Juan/San Miguel RMP endorsed only one of eight WSAs which were endorsed for Congressional wilderness protection by the BLM. The single area was the 28,000 acre chunk of land in the Delores River Canyon. Yet, the BLM couldn't very well ignore public comment in which the majority view was very supportive of wilderness. Hence, the Weber and Metafee Mountain Wilderness Study Areas were not endorsed for wilderness designation by the BLM and were administratively closed to development and vehicular access. Squaw Patoose and Cross Canyon, also, were administratively withdrawn due to fragile archeological resources. However, they were also Wilderness Study Areas and were not recommended by the BLM for official wilderness designation.

The point is BLM appears to be very willing to protect a number of Wilderness Study Areas through administrative means, yet not recommend their designation for wilderness legislatively. This keeps all future management options within the hands of the agency and the problem is that future administrative actions could very quietly remove the protected stipulations currently being considered in the Little Snake RMP, whereas removal of wilderness designation would require an act of Congress. And, the relevance that all this holds for the Cross Mountain WSA becomes obvious when one considers that the Preferred Alternative for Cross Mountain includes SRMA and ACEC recommendations for the vast majority of the original Cross Mountain WSA. These are administrative protections, the intent of which obviously is to preserve the wild characteristics of a Land IV recreational pursuits. But, the question still remains that if the wild characteristics of Cross Mountain are worthy of this protection, why not go all the way and recommend it for wilderness. Thank you.

MR. SPARKS: Questions from the panel?

(No audible response.)

MR. SPARKS: Thank you. The next speaker will be Rocky Smith.

MR. ROCKY SMITH: Hi, my name is Rocky Smith and I reside at 1030 Pearl Street in Denver, 80203. I'd like

to first tonight talk about wilderness in general and why I think it's a good idea. There is an ever shrinking amount of untrammeled land in the United States as cities expand, more oil and gas development, mining development, et cetera, and therefore I think it is very important that the federal agencies do their part to preserve the last remaining islands of land that are not developed by man. That was, of course, the original purpose of the Wilderness Act, to make sure that we had some such lands. These lands provide primitive recreation and outstanding opportunities for solitude and provide a home for wildlife, which is increasingly difficult with all the development. Also, wilderness is good economics. We've been discovering in the last few years more and more people are coming to Colorado and spending their tourist dollars here because we have a reputation with having a state that has a lot of beautiful land that isn't touched where you can go backpacking, hiking, fishing, climbing, hunting, et cetera.

Although most of the land that is well known is the so-called rock and ice wilderness managed by the Forest Service, I believe that BLM must do its part to preserve untrammeled land in Colorado and there's very good reasons for this. A lot of BLM land has features not found in the Forest Service land. It doesn't have the high mountains, but it has more wildlife, a wider variety of vegetation,

and is quite interesting. The few areas that I have visited, I have been very amazed at the diversity in the scenery and have been quite impressed with it.

Given all of this, it's very disappointing to find that the Little Snake Resource Area on the Draft RMP just released recommends only one area for wilderness out of eight. I'm glad to see that you did recommend Diamond Breaks. I hope you'll continue that recommendation in the final RMP. However, all the other areas have excellent wilderness characteristics. Of the five Dinosaur adjacent areas, all of them with the possible exception of Peterson Draw which has a mine just outside the area, all would make excellent additions to any wilderness in Dinosaur. So, I don't think that a nonwilderness recommendation is called for at this time, even though the areas by themselves may not be ultra-outstanding as are some of the other areas, I still think that these areas can be considered for wilderness. They will add to the Dinosaur system and make it a little larger, provide a little more protection, a little more isolation, a little more primitive recreation. So, therefore, I think they should all be recommended or, at least, tentatively recommended. West Cold Springs WSA, from just glancing over your RMP tonight, I didn't see any reason why this area should not be wilderness. All the leases are post-FLPMA. It shouldn't provide any problem

there and you, yourself, say in the RMP that the area does have a lot of excellent wilderness characteristics.

The area I'm particularly disappointed to see get a nonwilderness recommendation is the Cross Mountain WSA. I visited this area last Memorial Day and had a great time in spite of some slightly rough weather. First of all, it was hard to get to and, once we got there, I was very pleased with everything I saw, including the 1000 foot gorge formed by the Yampa River, a herd of antelope, and also some small animals and some cultural resources and other things. And, I see absolutely no reason why this area should not be recommended for wilderness. The BLM might argue that their designation in the Preferred Alternative in the RMP for Special Recreation Management Area might protect this area, but I would like to point out that this designation could easily be removed by subsequent agency managers. Also, this area just does not provide enough protection for the outstanding features in Cross Mountain. Also, the bighorn sheep there need protection. It's an excellent area for all sorts of recreations and just for its own sake, the oil and gas found there, if any, can certainly be found elsewhere. And, there is just no reason that this area should not be in the wilderness system. That's all I have to say. Thank you.

MR. SPARKS: Panel members?

UNIDENTIFIED VOICE: No.

MR. SPARKS: Thank you. The next speaker is Mary Boldt.

MS. MARY BOLDT: My name is Mary Boldt. I live at 390 South Poplar Way, Denver, 80224. I'm representing myself here tonight. I'd like to thank you gentlemen for the opportunity to speak.

I would like to support a wilderness designation for BML (sic) lands in the Little Snake Resource Area. Rocky mentioned a lot of tourist dollars come into the state, but I can also attest to the fact that a lot of people move here because of that -- use to get into the mountains and experience the wild areas there. I don't think we should have to move to Alaska or go up to Alaska to see the wilderness areas when they are available close by.

However, I found that there are a lot of individuals and parties interested in developing the areas for other uses, such as oil and gas leasing which adversely impact the wilderness qualities of the lands. I think the BML (sic) should be more concerned with insuring that wildlife habitats in areas of ecological importance are protected, such as Cross Mountain, Cold Springs Mountain, the areas adjacent to Dinosaur National Monument, and the Yampa River area. I believe the Resource Management Plan

should be amended to approve wilderness designation for particularly the Cross Mountain Wilderness Study Area, especially when selling 18 of the 1,878,000 acres available for federal oil and gas leasing in that vicinity.

I'm pleased that the BLM has come through with its recommendations for wilderness designation for Diamond Breaks and Irish Canyon, but I also hope the final plan will, also, include designation for other areas, especially Cross Mountain, not just administrative protections, such as a Resource Management Area, but instead inclusion also for protection under the Congressional Wilderness Act. Any questions?

(No audible response.)

MR. SPARKS: Thank you. Susan Martin.

MS. SUSAN MARTIN: I am Sue Martin, 4700 Venturi Lane, Fort Collins, Colorado, 80525. I'd like to speak with two hats tonight. First, I'm the Conservation Chair of the Colorado Native Plant Society and I would like to comment on behalf of the Society, supplementing our previous remarks that we are, indeed, disappointed that only the Diamond Breaks Wilderness Study Area is recommended in the Preferred Alternative as suitable for wilderness designation. Because, in addition to the special concern plant species and plant associations about with you've already heard our comments, the Colorado Native

Plant Society is equally concerned with conservation of all our state's native flora, common species as well as rare. Although we realize that wilderness designation may be accompanied by problems of overuse or abuse, other forms, we nonetheless support wilderness for its many educational and recreational opportunities, including the pleasures our members, like many other people, derive from quiet activities in natural settings. The RMP states and I think it's worth quoting candidly, quote, "nondesignation of a Wilderness Study Area would cause the loss of wilderness values in the long term because of short term surface uses, such as road construction, vegetation manipulation, surface mining, or construction of facilities." End quote. Page 4-81. It seems inconceivable, then, that we cannot set aside just 7% of BLM lands within the Little Snake Resource Area which the eight WSAs would represent to prevent these losses to our future quality of life. The Colorado Native Plant Society, therefore, supports and urges the recommendation of all eight WSAs as suitable for designation and we especially support Cross Mountain for wilderness area designation recommendation.

Now, I'd like to change hats and speak for myself in a bit of a different vein. By profession, I am a research scientist and in my business we are supposed to be analytical and logical and take a structured approach to



1 questions. So, naturally, when the RMP arrived, I was  
 2 eager as a person concerned with environmental values to  
 3 look at the Natural Environment Alternative and to compare  
 4 that with other alternatives and ultimately, of course,  
 5 with referral alternative. I particularly was interested  
 6 in the stated objective of the Natural Environment  
 7 Alternative that, "it would emphasize the protection and  
 8 enhancement of the natural environment and resources of  
 9 substantial scientific interest." That was a direct quote.  
 10 I want to speak to what our moderator introduced or brought  
 11 up to us as a possible subject of concern and that's the  
 12 merit of the alternatives. When I made a comparison of the  
 13 Natural Environmental Alternative, I first went to some of  
 14 the points, such as oil and gas, surely a developmental  
 15 point. The Natural Environment Alternative says one  
 16 million acres, 1.00 million acres would be open to leasing  
 17 for oil and gas with standard lease terms. Well, surely,  
 18 the energy and minerals is going to be many times that,  
 19 right? Guess again, 1.10 million acres opened to leasing  
 20 with standard lease terms. Well, let's see, the Natural  
 21 Environment Alternative, 686,000 acres opened with seasonal  
 22 restrictions because of critical wildlife habitat. And,  
 23 energy and minerals, the same. Natural Environment  
 24 Alternative, 100,000 acres open with avoidance stipulations  
 25 or no surface occupancy. Energy and minerals, 56,000.

1 Only 44,000 acres difference. We're talking in an area of  
 2 1.9 million acres, remember. In areas closed to leasing as  
 3 proposed wilderness, here we would have our difference.  
 4 91,000 acres in natural environment and 35,000 acres in  
 5 energy and minerals. Well, surely, I must be looking at  
 6 the wrong issue. So, I looked at livestock grazing.  
 7 Natural environment, oh boy, 124,000 AUMs authorized.  
 8 Surely, energy and minerals is going to be many times that.  
 9 No, 152,000. Only, maybe 20% different. Threatened and  
 10 endangered -- and BLM sensitive plants, surely, the Natural  
 11 Environment Alternative will provide substantive  
 12 protection, won't it? Let's see, natural environment,  
 13 21,975 acres designated as RNAs or ACECs; energy and  
 14 minerals, 19,380 acres. That's a difference of only 2600  
 15 acres. And, so forth.

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16 This goes on and on and on. My conclusion -- the  
 17 only conclusion I can logically reach is that the Natural  
 18 Environmental Alternative would be better named the  
 19 slightly less development alternative. In following this  
 20 up, then, I compiled a table in which I examined the  
 21 Preferred Alternative for each issue, all 19 of them, and  
 22 determined which other alternative it most closely  
 23 followed. It was no surprise that the answers were always  
 24 energy and minerals or commodity production. My point is,  
 25 then, that the Natural Environmental Alternative or the

1 slightly less development alternative, as I prefer to call  
 2 it, would make such a little difference in what is  
 3 available for development and production that it seems  
 4 ridiculous that you have to listen to all of us here  
 5 tonight asking and arguing and begging and pleading for  
 6 setting aside these few areas. Perhaps, five WSAs may be  
 7 lumped into three, grouping the three small areas and  
 8 adding maybe 50,000 acres and recognizing four other small  
 9 sites as RNAs or ACECs, particularly urging that Ink  
 10 Springs be designated and so forth. Thank you for your  
 11 consideration of our comments.

12 MR. SPARKS: Panel, any questions?

13 (No audible response.)

14 MR. SPARKS: Okay. Thank you, ma'am. The next  
 15 speaker is Dianne Andrews.

16 MS. DIANNE ANDREWS: My name is Dianne Andrews.  
 17 I'm here tonight representing the Wilderness Society. The  
 18 address is 1720 Race Street, Denver, 80206. The Central  
 19 Rockies Office represents over 5000 Wilderness Society  
 20 members in Colorado and Utah. My comments tonight will be  
 21 brief. We will submit more detailed comments before the  
 22 May 9 deadline.

23 To date, less than 1% of the officially  
 24 designated wilderness in the U.S. is managed by the Bureau  
 25 of Land Management. From the looks of this draft plan, the

1 BLM plans to do little to enlarge its share of federally  
 2 designated wilderness lands. This is a most unwarranted  
 3 situation since the BLM lands contain the nation's last  
 4 wilderness frontier, a veritable treasure chest of diverse  
 5 wildlands. No other federal agency provides more habitat  
 6 for wildlife or contains more diversity of ecosystems or  
 7 has more potential for archeological discoveries.

8 In Colorado, demand for wilderness recreation is  
 9 growing. BLM's draft plan points out that demands for  
 10 nonmotorized forms of recreation appear to be increasing in  
 11 the Little Snake Resource Area, especially in the  
 12 Wilderness Study Areas. The plan goes on to quote a 1981  
 13 study which indicates that "additional wilderness areas  
 14 will be needed in the near future to satisfy demand, supply  
 15 the economic optimum amount of wilderness, and provide  
 16 protection for fragile ecosystems."

17 In utter disregard of the increasing demand for  
 18 and appreciation of these diverse wildlands, only one of  
 19 eight WSAs in the Little Snake Resource Area has been found  
 20 suitable for wilderness designation. Although each of the  
 21 three largest WSAs, West Cold Springs, Diamond Breaks, and  
 22 Cross Mountain, were found to have outstanding  
 23 opportunities for solitude and for primitive and unconfined  
 24 recreation, only one, Diamond Breaks, merited BLM's  
 25 recommendation for wilderness. Human imprints on all three

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areas are minor, according to BLM's evaluation, and wildlife is abundant.

BLM attempts to justify its nonwilderness recommendation for Cross Mountain in an area which provides crucial habitat for threatened and endangered species and uncharted cultural resources on the basis of its moderate to high potential for oil and gas resources. Yet, three dry holes have been drilled recently around the mountain. And, this irreplaceable wilderness represents less than 1% of the federal oil and gas acreage in this area.

Cold Springs Mountain which the Colorado Division of Wildlife would like to manage for trophy elk hunting has been bumped from the wilderness list in favor of oil, gas, and livestock. Again, this area comprises less than 1% of the total available mineral acreage in the vicinity. As for livestock grazing, at least, one third of the land management area is in unsatisfactory condition for livestock grazing and another third is in unknown condition. So, in addition to the loss of wilderness values in this area, we could see an increase in erosion and water quality problems if BLM recommendations are implemented.

The Preferred Alternative would allow significant adverse impacts to wilderness values to occur on over 60% of the acreage studied. In the BLM's own words, quote,

"Opportunities to expand diversity in the National Wilderness Preservation System would be lost, as would wilderness opportunities within a day's drive of major population centers in Colorado and Utah."

The people of Colorado who care about the protection of our public lands cannot, and will not, accept these irreversible and irretrievable losses. Thank you.

MR. SPARKS: Thank you. Our next speaker will be Dorothy Cohan.

MS. DOROTHY COHAN: My name is Dorothy Cohan and I reside at 2845 Elm Avenue in Boulder, 80303. On looking over your recommendations, I was sorely disappointed that Cross Mountain area was not recommended due to the major recreation areas, kayaking, and hiking, and including the wildlife. I just think that our future generations need something to be able to have for them to be able to see and not just, you know, oil and gas and more pavement. And, I think that we owe something to the future. And, the other resource is our cultural history and I think there's a lot of untapped resources there and I don't think that we can just abandon, you know, our past history of American life. Thank you.

MR. SPARKS: Thank you. Our next speaker will be M. P. Steinkamp.

MS. MERNA STEINKAMP: My name is Merna Steinkamp and I reside at 4700 Venturi Lane, Fort Collins, Colorado, and I will be very, very brief tonight. I will make more extensive and specific comments in writing later. But, I would like to go on record tonight as supporting all of the possible wilderness and special management designations that are proposed in all of the alternatives and which have been eloquently supported by the various environmental groups here tonight.

I really don't want to see our lands plundered for more and more economically inviable abuses, such as grazing, oil and gas, and coal mining. Some better balance can and should be found. Thank you.

MR. SPARKS: Thank you. Mike Figgs?

MR. MIKE FIGGS: My name is Mike Figgs. I live at 2216 Bluff Street in Boulder, 80302. I would like to support the All Wilderness Alternative and specifically I'd like to address the five Dinosaur adjacent Wilderness Study Areas, Ant Hill, Chew Winter Camp, Peterson Draw, Teepee Draw, and Vale of Tears. One criterion that I would like to briefly discuss involving these is found in the Wilderness Supplement under Criterion #1, Part 2, Special Features. This includes ecological and scenic valleys. It's not clearly stated in the Wilderness Supplement how these areas relate to Dinosaur National Monument in

ecological values. I think that increasingly this is a more and more important criterion for wilderness designation. Generally, they tend -- Wilderness Study Areas tend to be supported for recreational features. I think that we need to look more and more at ecological aspects of this.

One of the most important things are watershed values. For instance, from these five Wilderness Study Areas among others, Warm Springs Draw, Big Joe Draw, Peterson Draw, Buck Draw, and Bower Draw, all empty directly into the Yampa River. And, it's admitted in the Wilderness Supplement that nonwilderness designation would increase sedimentation in all of these unless mitigation is undertaken on these sites. So, we see here that what happens in these areas has direct impact on Dinosaur National Monument. I would like to see that you have the ecosystem there expanded and to view these things on the ecosystem management approach where we would be looking at watershed values, as well as other values, in wilderness designation.

I've noted that the All Wilderness Alternative is 90,000 acres or a little bit over and using the 2.4 million acre jurisdiction of the Little Snake Resource Area, it turns out to 3.7% of the area. Diamond Breaks alone is a little under 1.5%. So, although we don't want to

necessarily recommend Wilderness Study Areas based on percentages alone, I think it's clear that there's -- recommendation for these areas. Also, for coal leasing, they effect less than 5% altogether and oil and gas is 10%, using the figures from the Preferred Alternative -- excuse me, coal would be 20%.

I noted, also, in the Rocky Mountain News last week under an article on the ski industry in western Colorado that Colorado Ski, Incorporated, was mentioned that tourism by the year 2000 would be the #1 international industry. And, I think since wilderness designation is a renewable resource from an economic standpoint that, also, they are worthy of designation. I would, also, like to support Ink Springs as a research and natural area. Any questions?

(No audible response.)

MR. FIGGS: Thank you.

MR. SPARKS: Thank you. The next speaker will be Dave Allured.

MR. DAVE ALLURED: My name is Dave Allured and I live at 4231 Eaton Court in Boulder, 80303. I have visited Cross Mountain and the Dinosaur National Monument and the vicinity around it several times within recent years. In general, I would like to encourage the Bureau of Land Management to reconsider its negative recommendation on

seven of the eight Wilderness Study Areas in the vicinity and to reverse them. I believe that they all contain substantial values that when added up are of greater long term value than mineral development and other commercial uses of these wilderness areas. I would, also, like to thank you for your recommendation to designate the one Wilderness Study Area that you did recommend and I, also, thank you for supporting the research and natural area recommendations that you expressed.

I have only had a chance to look over the summary of your Wilderness Appendix document before I came to the hearing tonight. One thing that I noticed that I thought was sort of a glaring problem was that in virtually every Wilderness Study Area that you mentioned in the summary, you seem to be comparing -- you seem to be expressing on the one hand that you did find that, in general, basic wilderness values were present in all of the areas and, yet, at the same time, almost all of the areas that were not recommended for wilderness designation, they were done so -- your recommendation was based on primarily the -- excuse me. Your recommendation appeared to be based on speculated mineral values for the areas, rather than for proven values. The exception to that was that you did mention the existence of limestone potential for these areas. I think that that's sort of an unfair comparison

and that you really ought to sort of statistically balance comparing a speculated potential when you're talking about the economic value of the oil and gas potential versus the proven and apparently increasingly important wilderness values, natural values that are seen in the area and that seem to be more and more expressed by people all the time.

Let's see, I guess the last thing I have to say is merely to thank you gentlemen for taking the trip over from the western slopes and giving us all time to hear you out. Any questions?

MR. SPARKS: Thank you. The next speaker will be Earl Jones.

MR. EARL JONES: My name is Earl Jones. I live at 3035 O'Neal Parkway, Apartment S-21, in Boulder, 80301. I'm here speaking mostly for myself. And, speaking for myself, I am extremely disappointed that you only recommended one of the eight Wilderness Study Areas for wilderness protection. In looking over your summary, what I found was that there is apparently no known value in developing any of these areas and when you contrast this with the known values in maintaining them as wild areas, the known values and preserving ecosystems, and known values in recreation, it doesn't seem reasonable that these areas should not be recommended for wilderness protection. In addition, when you consider the wilderness Study Areas

as the fraction of the land which is potentially available for exploitation, it seems that setting these aside as wilderness areas would not significantly affect resource availability. And, given all of that, I simply cannot understand the decision not to recommend all eight Wilderness Study Areas for protection.

MR. SPARKS: Thank you. The next speaker is Robert A. Ripple.

MR. ROBERT RIPPLE: My name is Robert Ripple and I live at 2075 Hudson Street in Denver and I'm representing myself. I wanted to address a couple of the issues that occurred to me as I looked at the Draft EIS, particularly with reference to Cross Mountain WSA. I work in the oil and gas industry and I am a geophysicist by training and by profession. And, I'm familiar with the subthrust style of play that exists at Cross Mountain. And, I'd just like to point out that that kind of play is very common throughout the Rockies. The reserves that have been discovered to date with that kind of play are not unusually large and that many of the oil fields along the axial uplift that have been discovered in recent years are of marginal economic value. Also, subthrust plays tend to be more expensive. In the case of Cross Mountain, you're going to have surface occupation problems. The topography is rugged. As a result, it will be more expensive to drill

because you're going to have to spend more money creating roads and, also, creating drill pads. And, currently, the price of oil is so low that I don't know of any companies in my personal experience that are exploring in the axial uplift, although I understand there have been a few dry holes there recently. But, what I'm getting down to is I really don't think that the axial uplift is a very economic play currently and, given the kind of reserves that we've seen along the axial uplift in the last five to 10 years, I don't think that it's going to be an area that's going to be particularly hot for exploration in the next five to 10 years and probably not into the foreseeable future.

I wanted to point out that natural resources are finite and that in the Rockies wilderness is even more finite than oil and gas. And, I don't know exactly how the panel addressed the issue of surface occupancy in Cross Mountain WSA, but I don't think that that's a very viable idea either because realistically if you're going to have surface occupancy stipulations, i.e. you can occupy a site off of the Wilderness Study Area and then directionally drill underneath into the thrusts, you would only be able to tap, with current technology at drilling depths that shallow, some very limited areas underneath the edges.

Also, roading the areas would stress wildlife, especially the bighorn herd that the BLM is supposed to be

attempting to enlarge in the area. Bighorns are notoriously prone to stress. Also, roading the area for oil and gas would destroy a renewable resource, the recreation of the area. The fishing, the hunting, the kayaking, and the backpacking will provide a more stable, economic base in the long run for west slope communities that have been hard hit by boom and bust economies and are trying to make the transition to stable economies that will pay for the people for decades to come.

In conclusion, almost any sedimentary basin can be interpreted as having oil and gas potential by some geologists and geophysicists. And, the question that needs to be asked is not can we exploit these resources, but in the case of defacto wilderness areas, do we need to exploit these resources? And, I'd like to add further that I'd like to see Cross Mountain Wilderness Study Area and other Wilderness Study Areas throughout BLM lands enlarged. I think 14,000 is piddly because I can walk across that in a single afternoon. And, that, to me, doesn't really qualify as a true wilderness experience. Thank you.

MR. SPARKS: Our next speaker will be Nicholas Brown.

MR. NICHOLAS BROWN: My name is Nicholas Brown. I'm here representing tonight the Colorado University Wilderness Study Group. Our address is Colorado University

Wilderness Study Group, Campus Box 207, University of Colorado, Boulder, Colorado, 80309.

I've visited West Cold Springs and Limestone Ridge, as well as Irish Canyon, and I've seen some of the other areas from a distance. The CU Wilderness Study Group will submit written comments at a later date, but I have a few brief ones for the moment.

I thank BLM for the opportunity to present public comment on the Little Snake Draft Resource Management Plan/EIS. It is unfortunate, however, that there's very little else to thank BLM for in light of -- rather irrational nonwilderness recommendations for the majority of the WSAs.

The overemphasis on oil and gas and other resource potential are particularly disturbing. The BLM wilderness study process does not imply handing resource development interest leases on a silver platter with no questions asked. The BLM wilderness study process does not entail simply lining up Cross Mountain, West Cold Springs, Diamond Breaks, and the other WSAs up and stating that high potential for resource development exists and all the WSAs except for Diamond Breaks and, therefore, no WSAs are suitable for wilderness except Diamond Breaks which happens to have low potential for development. Yet, this seems to be what the BLM has done.

In doing so, the BLM has totally ignored recreation values, wildlife values, and other natural values of these areas. These can be considered renewable resources. The BLM wilderness study process is supposed to be a professional impartial process in which impartial objective recommendations are to be made about the public lands. It is the U.S. Congress that is to decide which WSAs are to be managed as wilderness and which are to be managed for other uses.

The BLM decision not to recommend Cross Mountain as suitable for inclusion as wilderness is just one of many decisions which stands out as a glaring example of BLM partiality to oil and gas and other resource development interests. When BLM ignores wilderness values in Cross Mountain, one of the most stunning and ecologically diverse Wilderness Study Areas in northwestern Colorado, it shows just how irrational BLM decision making in the wilderness study process has become. In this case, BLM has ignored wilderness wildlife values, such as bighorn sheep, antelope, mule deer, elk, endangered fish species, as well as Peregrin Falcon and Golden and Bald Eagles that use the Cross Mountain WSA as habitat. And, then, BLM blatantly overemphasizes resource development potential speculating on high potential for oil and gas occurrence. This does not show anything like impartiality.

1 While BLM's own analysis shows that Cross  
2 Mountain and West Cold Springs Mountain qualify as  
3 wilderness, then, BLM states that wildlife, recreation, and  
4 natural values can be protected with administrative  
5 designations while allowing potential oil and gas  
6 development to occur. Well, when oil and gas development  
7 does occur, roads are developed, pipelines are laid,  
8 utility quarters are set up, and wildlife is disturbed and  
9 threatened.

10 While supporting BLM efforts to protect rare and  
11 unique plants in Irish Canyon and adjacent Limestone Ridge  
12 with administrative protection, the University of Colorado  
13 Wilderness Study Group questions the effectiveness of these  
14 designations in times of intense resource development.

15 This is why the Wilderness Study Group recommends  
16 protection for Cross Mountain, West Cold Springs Mountain,  
17 Vale of Tears, and Diamond Breaks, as well as the other  
18 WSAs in the Little Snake Resource Area and recommend that  
19 protection be nothing short of inclusion into the National  
20 Wilderness Preservation System as wilderness areas.

21 Just a few more comments I'd like to make. One  
22 of which would be as far as Vale of Tears, Tepee Draw, Ant  
23 Hills, Winter Camp, and some of the other small study  
24 areas, WSG highly recommends these areas as additions to  
25 the Dinosaur National Monument because they would round up

1 topographical boundaries to Dinosaur. Also, CU Wilderness  
2 Study Group finds it unfortunate that the Little Yampa  
3 Canyon has not been evaluated -- in the scenic river  
4 potential and that, at the very least, it should be  
5 designated as an ONA. Do I have any more time?

6 MR. SPARKS: You've about used your time.

7 MR. BROWN: Okay. Thank you very much.

8 MR. SPARKS: Thank you. Let's take about a five  
9 minute stretch break and, then, we'll continue.

10 (Brief recess off the record.)

11 MR. SPARKS: Our next speaker is Roger Fuehrer.

12 MR. ROGER FUEHRER: Thank you. My name is Roger  
13 Fuehrer. I live at 4225 East Mexico, Denver, Colorado,  
14 80202. That's Apartment 1304. I'm here as a native of  
15 Colorado and a highly experienced oil development investor.  
16 I did not say rich investor because I have learned, having  
17 invested starting in the early 70's, in the school of hard  
18 knocks. But, before I go into that, I'd like to say that  
19 I, also, worked for the Bureau of Reclamation for several  
20 years and I know that no plans to build a water project  
21 ever die. And, I'm beginning to wonder if perhaps the real  
22 reason why an area like Cross Mountain wasn't designated  
23 was because there still is the plans to build a Cross  
24 Mountain Reservoir. But, I'd like to quote the Rocky  
25 Mountain News, Monday, January 6, 1986, with the Galloway

1 Group and its chief proponent, Dale G. Berry. He's fallen  
2 behind on payments for 13 northwestern Colorado ranches.  
3 He -- for reservoir site and has been in arrears on  
4 property taxes. The Galloway Group Ltd. office in Meeker  
5 is closed and Executive Vice President Phil Ray has found  
6 another job. The Bureau of Reclamation has said, which  
7 operates most of the dams along the Colorado River and its  
8 tributaries, that the plan's chances were less than  
9 nothing.

10 So, if, in fact, the Cross Mountain Dam is not  
11 what's really behind not designating this area as a  
12 wilderness, perhaps it's this. "As opposition mounted,"  
13 quoting the paper, "Berry shifted into low gear mainly  
14 because of funding, he said. Most of the potential  
15 investors were in the oil and gas business." So, I'm  
16 wondering if the oil and gas people aren't the ones that  
17 really have pushed, especially Cross Mountain which is the  
18 area that I'm most familiar with.

19 Maybe, reviewing quickly some of oil investing  
20 and drilling statistics are important. On an average, 85%  
21 of all holes drilled for oil and gas are dry. I'm sorry,  
22 for oil, not gas. Over half of those are not economical  
23 and that's one of the things that I learned very hard.  
24 And, that is that there can be mud in the soils. Different  
25 soils may not be good enough to bring in enough of the oil

1 for all sorts of different reasons which the investment  
2 programs talk about. They are not able to make even a hole  
3 that has oil economical. Over half of them that have oil  
4 in them are not economical. This means that only one in 20  
5 holes drilled on a national average are economical. But,  
6 what we are talking about is both developmental and  
7 exploratory drilling sites. The area of northwest Colorado  
8 is not a development area drilling program. It's strictly  
9 exploration. The national average is that about 93.5% of  
10 all exploratory holes that are drilled are dry. Again,  
11 those that have oil, approximately half of those are not  
12 economical. So, that leaves us with approximately 97% of  
13 all holes that are drilled or one in 40 have oil economic  
14 recovery. I have now learned to invest in this kind of a  
15 program would make about as much sense as investing in a  
16 ski area in Kansas and Texas. So, that's why I am not a  
17 rich experienced oil development investor.

18 The average well that is economical -- a good  
19 well produces approximately 15,000 barrels of oil over its  
20 lifetime which means 20 to 25 years at the current price of  
21 anywhere from \$12.00 to \$15.00 a barrel and who knows where  
22 it will be in the future. What this means is that  
23 approximately 40 wells are going to have to be drilled to  
24 bring in a total of about \$175,000.00 over a period of 20  
25 to 25 years.

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The Tourist Bureau indicates that the average tourist spends \$35.00 a day. That is compounded to well over \$50.00 a day when you add in all of the other related industries and businesses. Approximately, \$50.00 a day to the local economy. Or, over the period of a lifetime of a well, you would have to have 2200 man day visits of recreational or tourist use that would equal one well.

The BLM has unique land form features in its area. It has an opportunity to preserve some great land that has not been preserved. The area of northern Colorado is most excited and I would hope that all eight WSA areas be recommended and changed for wilderness. This would put the economic base where it belongs, into long recreation and tourist dollars without destruction of Colorado's greatest asset and that's our natural scenery. Thank you.

MR. SPARKS: Thank you. Our next speaker is Ginky Anderson.

MS. GINGY ANDERSON: My name is Ginky Anderson and I'm here independently. I guess, although I've been affiliated with the Wilderness Study Group in the past. And, my address is Flagstaff -- Star Route, Boulder, Colorado, 80302. And, I just kind of scribbled this so I'll have to try and read it and it might be kind of hard. So, you'll have to excuse me if I stumble.

I want to say that I applaud the BLM's

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recommendation for Diamond Breaks as wilderness, but I have to question their decision not to recommend some of the other areas. Cross Mountain is the area of which I am most familiar and so it is the one which I will address. This area's wilderness values are unquestioned. It offers tremendous recreational opportunities: hiking, backpacking, and kayaking. I've heard numerous accounts of friends who have run into herds of bighorn sheep and wild horses. Cross Mountain is crucial habitat with numerous threatened and endangered areas. These facts are all acknowledged in the BLM Resource Management Plan and yet this area was not designated due to potential oil and gas resource conflicts. I urge the BLM to give equal consideration to the value of wilderness as a resource in itself; a resource that, if managed correctly, will be sustainable for our need and use of wilderness which isn't a boom and bust cycle such as the oil and gas economy which, as we all know, is widely fluctuating. This fact coupled with the high cost and generally low cover of hydrocarbons in the Rocky Mountain basins means that, if anything, an unstable economic investment for this area. Wilderness is a sustainable resource or it can be.

I am, also, concerned about the environmental impacts that will result without wilderness designation of Cross Mountain. Oil and gas drilling, as well as

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overgrazing and other activities which increase surface disturbance, will increase soil runoff and erosion and consequently increase both the suspended and dissolved loads in adjacent tributaries. As the RMP itself acknowledges, soils in this area are very saline and so, therefore, an increase in erosion will change the solidity of the runoff in the surrounding watershed. Changes in this watershed will affect the Yampa and eventually even the Colorado River. I am a geologist and not an ecologist, but I do know that all ecosystems are in some way connected and what happens on Cross Mountain will certainly affect Colorado in other ways.

There are already close to two million acres of land leased to oil and gas just in the vicinity. There are, at this time, only 36,000 proposed acres of wilderness. I think that the addition of Cross Mountain as a wilderness area would be using this land to its greatest potential. I don't know what administrative protection is. I guess, that's what the alternative is to the legislative designation. But, I don't trust the sound of it. And, I don't believe that it will get the protection that it needs.

MR. SPARKS: Questions, clarifications?

(No audible response.)

MR. SPARKS: Thank you. Our next speaker is

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Linda Batlin.

MS. LINDA BATLIN: My name is Linda Batlin. I live at 680 Tantra Drive in Boulder, 80303, and I represent myself. I have lived in Colorado almost 14 years. I enjoy the varied landscape and recreation possibilities. I, also, spend my springs and autumn exploring BLM areas. I have visited two of the eight areas in the Little Snake region, Diamond Breaks and Cross Mountain. I was sorry that only one of the eight areas was recommended for wilderness. I am pleased that Diamond Breaks is being recommended and I commend the BLM for that. But, I was dismayed that Cross Mountain was deemed as unsuitable for wilderness. I find this a great inconsistency.

Cross Mountain is such an extraordinary area that it deserves permanent protection rather than the administrative protection that the BLM proposes which would leave the area open to mining claims. Not only is Cross Mountain rich in archeological remains, it also has abundant wildlife. Last May when I was there, we were crossing a grassy plain on top of the mountain and a herd of antelope charged up to greet us. This WSA is about the most varied one that I have seen from its steep canyons to the broad grassy plains to the breathtaking 1000 foot gorge that has been carved by the Yampa. Surely, wilderness attributes abound here and this is a resource that needs to

be sustained through wilderness protection.

Wilderness management is inexpensive relative to oil and gas leasing and drilling. And, in the face of massive budget cuts, it should be regarded more favorably. 8% of Colorado's land area remains wild, but only 4% currently protected through wilderness protection. Let's not lose the other 4%. I urge the BLM to reconsider Cross Mountain and make a recommendation for wilderness protection for this and other areas in the final plan. Thank you.

MR. SPARKS: Thank you. Our next speaker is Martin Walter.

MR. MARTIN WALTER: Hi, my name is Marty Walter. I live at 3333 Nebo Road, that's N-E-B-O, Jamestown Star Route. It isn't in any town. With your permission, I'd like to hand this to you. The thing I just handed out was a picture which I've been looking for for a long time. I finally found it. It's a picture of the United States at night by satellite. I was looking for some proof that I could make of this wilderness map of the United States. It's 1980. You probably can't see all of it, but there's this little map of the United States and there's some little black dots that designate the defacto wilderness. I mean, the wilderness that was left in the United States in 1980. And, since then, James Watt has been using some

white out. Okay. Now, above this we have a satellite picture of the United States at night. Okay? As I demonstrated here, USA at night, light equals urbanized. Just because it's black, doesn't mean it's wilderness. There's a huge area here that's an atomic test site, for example. It should be glowing in the dark, you know. Anyway, 200 years ago, the whole place was black. Okay? Now, the eastern half of the United States, starting from Kansas is practically solidly lit. Okay? So, everything has gotten whittled down. We've got lots of lights all along the coast and all through the Rockies here. Lots of lights. Okay? That's what our culture has been doing to the wilderness, whittling it down, whittling it down. That brings us down to 1.3 million acres in the Craig District. Okay. Now, they whittle that down when they're talking about wilderness. There exists, at least, 150,000 to 200,000 roadless acres there, but that got whittled down to 91,000 acres -- or, actually, 9,887 acres that they consider for wilderness. And, now, they're telling us they're going to whittle it down further to 36,000 acres. We're only going to give you Diamond Breaks at 36,000 acres. I don't think that's much to be thankful for. Okay? Although I should be polite, I suppose. But, I don't feel like it. I really don't feel like it. I decided -- I've been to hearings like this time and time

again and I decided tonight I'm not going to be polite for once in my life because I don't represent anybody but myself tonight.

You can judge from results where are these fellows' hearts? I mean we've been listening all night here, okay? Where's the oil and gas people? Their big offices are right down the road a piece. I had to come all the way from God knows where and all they have to do is just walk down the road. So, where are you oil and gas people? They must write awful effective letter because I haven't heard a single word for oil and gas tonight. Now, I'm going to stay until the end to see if I can hear one, okay? I don't think I'm going to. I get the impression that the BLM goes way out of its way to protect the possibility of a development of some oil somewhere. Three dry holes in Cross Mountain equals a high development potential. Well, we've got the last goddamn tributary of the Colorado, the Yampa. If you're not going to protect the last tributary, what are you going to do? When are you going to start protecting something? It's the last free tributary. Three dry holes is high potential. We've got the last tributary of the Colorado River. It's free-flowing. Have you ever heard of slant drilling? If there's a big oil shortage in the future, you could have this 14,000 acres -- you can slant drill into it if it's

that big of a deal. If it that's big of a deal, the Congress will undo wilderness designation. I mean, what Congress gives, Congress can take away. So, I'm just visibly upset tonight.

So, we start with a country full of wilderness. We've got 3.1 million acres in the Craig District gets whittled down, whittled down, whittled down. If you gave it all to us, if you gave 91,000 -- and, what are you giving it to? Are we buying it? Are we big money guys? No. None of us are making a dime here tonight. Not a single one of us are paid. Why are we here? Because we love the damn place, that's why. So, I mean, I've listened and listened and listened all night and got this report. If NASA gave as much consideration to safety as you do wilderness, we'd never gotten off the launching pad, let alone had a big accident. It's not funny. It's just true. Are we going to leave any decisions for the next generation? Any, at all? Are they going to have any wilderness to play with? Even decide whether they want to have it or not?

So, I guess, I've said my piece and I'll retire. Thanks for listening. And, I don't know. I just -- if I listen to all this tonight and I was one of you guys, I couldn't sleep tonight. I really couldn't. Thanks.

MR. SPARKS: Thank you. Our next speaker is

1 Lawrence Papp.

2 MR. LAWRENCE PAPP: My name is Lawrence Papp. I  
3 reside at 6224 Powell Road, Parker, Colorado, 80134. I'm  
4 representing myself. I support recommending all eight  
5 Wilderness Study Areas to wilderness protection. I  
6 strongly oppose the Preferred Alternative recommended in  
7 the Draft Resource Management Plan. I feel the Preferred  
8 Alternative inaccurately addresses the issue of wilderness  
9 protection. The eight Wilderness Study Areas encompass  
10 nearly 91,000 acres. The BLM has recommended only one area  
11 of 36,000 acres as suitable for wilderness.

12 I feel that Cross Mountain Wilderness Study Area,  
13 an area of 14,081 acres that contains some of the most  
14 stunning and ecologically diverse country in northwest  
15 Colorado, is worthy of wilderness protection. BLM  
16 speculates that there is moderate to high potential for oil  
17 and gas. The agency apparently ignores, at least, three  
18 dry holes recently drilled around the mountain. This area,  
19 also, contains important habitat for Peregrin Falcons,  
20 Golden and Bald Eagles.

21 I oppose the BLM recommendation of no wilderness  
22 protection for Cold Spring Mountain. This area comprises  
23 less than 1% of the total available mineral acreage in the  
24 vicinity. This area, also, contains outstanding wildlife  
25 values.

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1 I support wilderness designation for the five  
2 Wilderness Study Areas that border Dinosaur National  
3 Monument. These areas would topographically complete the  
4 boundaries of the national monument. The BLM has failed to  
5 make these recommendations.

6 I do commend the BLM for their recommendation of  
7 wilderness protection for the Diamond Breaks Wilderness  
8 Study Area. I support designation for the Irish Canyon as  
9 an area of critical environmental concern and Limestone  
10 Ridge as a research and natural area.

11 In closing, I feel the draft plan falls short in  
12 protecting a small part of the Craig District BLM land that  
13 contains outstanding wilderness characteristics. For this  
14 and future generations of Americans to enjoy and protection  
15 of wildlife habitat, I strongly urge the Craig District to  
16 improve the plan by recommending seven more Wilderness  
17 Study Areas for permanent protection in the final plan.  
18 Thank you.

19 MR. SPARKS: Any questions?

20 (No audible response.)

21 MR. SPARKS: Thank you. Our next speaker is  
22 Matthew Duhaime.

23 MR. MATTHEW DUHAIME: My name is Matthew Duhaime.  
24 It's spelled D-U-H-A-I-M-E. I'm a native of Colorado. My  
25 address is 2512 Mapleton. Boulder, 80302. The

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1 organizations I represent here today are the Colorado  
2 Mountain Club and the Colorado River Coalition. The  
3 Colorado Mountain Club is an outdoor outing group based  
4 basically on the front range, but we have members on the  
5 western slope, too. And, the Colorado River Coalition  
6 which is a group of river orientated outdoor enthusiasts  
7 and conservation groups.

8 The reason why I'm representing these groups here  
9 today is because I have extensive experience in these  
10 areas, having been a river guide in the Dinosaur National  
11 Monument Area since 1969. And, over those years, I've  
12 guided probably about 1000 people through Dinosaur National  
13 Monument. Now, some of the areas that we really enjoy  
14 hiking up are the areas north of Dinosaur National  
15 Monument, in particular Tepee Draw, Peterson Draw, and the  
16 Vale of Tears. These areas all have excellent wildlife.  
17 There are a lot of mountain lion there. It seems like deer  
18 like to migrate alongside the rim there and the mountain  
19 lion like to hunt them. And, I've, also, seen extensive  
20 Indian archeological sites. We've found -- blades, chips  
21 all over. Apparently, this area geologically has a lot of  
22 flint and chert in it and I'm surprised that your study  
23 does not call this to question. Especially, the Diamond  
24 Breaks area which is adjacent to the Jones Hole (phonetic)  
25 drainage. -- may call it a patshole (phonetic) or a

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1 pothole. And, these areas are virtually abundant in Indian  
2 remains, Matatis, pottery, old sites, and so I'm really  
3 surprised that you aren't talking about saving some of  
4 these sites, too.

5 Basically, the Colorado Mountain Club and the  
6 Colorado River Coalition would like to see all of these  
7 areas preserved, all eight designated as Wilderness Study  
8 Areas. It seems like Cross Mountain, the only reason it's  
9 really not there, is the proposed dam project. I don't see  
10 any other viable alternative. I make my living as a  
11 surveyor and I stake oil and gas wells and I've never seen  
12 an oil and gas well put into an area like Cross Mountain  
13 unless there's a lot of oil there. It's going to be hell  
14 trying to put a road and put a pad up in that area.

15 Also, the study seems to lack a lot of history in  
16 the area. I mean, these areas all adjoin Brown's Park  
17 which, as anybody in the area knows, covers a lot of the  
18 ancient folklore and history of the western states with  
19 rendezvous there. And, in particular, when I was a guide,  
20 we used to point out the Vale of Tears as we were going  
21 down the river because it's right there next to the -- and  
22 one of the main stories that was told to us by a ranger  
23 once was that at the Meeker Massacre, the Ute Indians took  
24 several captives, including some white women, and they  
25 headed off into the hills and that's where they ended up in



the Vale of Tears. And, apparently, they did some atrocities and one of the women were raped and that's why it was called the Vale of Tears. And, I would hate to see more Vale of Tears being placed on the map because we end up raping them. So, let's try and save a few more of these places. Thank you.

MR. SPARKS: Questions?

MR. DUHAIME: Sure, any questions?

(No audible response.)

MR. DUHAIME: No.

MR. SPARKS: Thank you. The next speaker is Joe McGloin.

MR. JOE MCGLOIN: Hello. My name is Joe McGloin. I live at 2716 West 25th in Denver and I represent myself. First of all, I would like to thank the BLM for allowing this forum tonight to voice our opinions. I, also, would like to thank you for the tremendous amount of work that you have done on the project. Even though I disagree with it, it doesn't mean I don't appreciate the work that went into it. I'd, also, like to thank all you folks for showing up. I'd like to address my comments to the status of wilderness in Colorado, whether it be BLM land or any other wilderness.

As we all know, the population of Colorado is skyrocketing relative to the other states. We, also, know

that the need for wilderness is, also, increasing. The evidence for this is readily apparent. For example, the Forest Service has had to institute the permit system in the Indian Peaks area simply because there are so many people that want to go there. If they didn't have a permit system, the place would be completely overrun. Obviously, there's a demand there for wilderness. The Forest Service has similar plans to institute the permit systems in the Eagle's Nest Wilderness Area and the Maroon Bells Wilderness Area, again indicating the need for wilderness.

Since the people are going to be turned away from Forest Service wilderness, where are they going to go? They're going to go to BLM wilderness in Colorado. And, they're going to continue to do this more and more in the future as the Forest Service wilderness gets limited in its ability to serve the needs of the people. And, what do we end up with? At least, in this area we're talking about tonight, we end up with 1% of the land being designation or recommended for wilderness designation. I have a hard time understanding that. Supposedly, the study is based on the concept of multiple use. It doesn't seem that way to me when a million acres gets appropriated for the gas and oil industry and only 35,000 acres gets designated for wilderness. What I'd like to see is the BLM take a harder look at the future needs for wilderness in Colorado and

designate wilderness based on that future need. Any questions?

(No audible response.)

MR. MCGLOIN: No questions, but lots of answers, huh? I thank you.

MR. SPARKS: Next speaker will be Pam Hoge.

MS. HOGE: My name is Pam Hoge. I live at 2300 Iris in Boulder. I've been crossing things out all evening. I don't know if I can read this very well anymore, but since I've been here this long, I'm going to try to get through it all.

I want to start out by saying it's difficult for me to come to testify at hearings like this in some building in downtown Denver when we're talking about preserving the wildlands. But, I'm here tonight because I feel very strongly about it, obviously, and about the dramatic need for preserving these lands and particularly in light of the disturbing small amount that exists today, a mere 2.1% and the U.S. has preserved this wilderness.

I was born and raised here in Colorado and now live in Boulder and stay because of its very special environmental qualities as I think all of you agree with. As a member of a Boulder County long range planning board, I understand and appreciate the difficulties you have in trying to juggle all of the interests and concerns while

making a balanced decision. But, it really boils down to a matter of priorities. But, priority has been development and extraction of resources until only about 8% of Colorado's land can even be considered possible wilderness.

Now, we have only eight Wilderness Study Areas left in this area. I appreciate your recommendation for Diamond Breaks and obviously am extremely disappointed in your recommendation for the other seven areas. I have spent a lot of time in the Dinosaur National Monument area and I am very familiar with some of the Wilderness Study Areas, in particular the Cross Mountain one. I've gone back to Cross Mountain quite a few times and it's a spectacular place as everybody has mentioned and I know you all know. One thing that really amazed me is that you could walk within an hour and you could come across several different types of very different ecosystems, from the high plateau of the mountain tops to the east/west valleys on the other side of the mountain. We've discovered a lot of Indian artifacts and were told that it was rich in archeological heritage. We came across an arrowhead once that was about that big. Then, to the dramatic gorge and all of its beautiful side canyons. I remember standing on the top of the rim and you could hear the rapids of, what is it, 1000 feet below. Cross Mountain wilderness qualities are well acknowledged. And, I'm going to say

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1 this and everybody else has said this. And, the potential  
2 of oil and gas is just that, a potential.

3 The protection of wilderness supplies a more  
4 stable source of income for the human population in terms  
5 of recreation, tourism, and habitat for hunting, as opposed  
6 to the boom and bust cycles of the nonrenewable resource  
7 development. I know that in the Craig area that hunting  
8 has been a very important element in this local economy  
9 particularly during the down cycles of the energy busts.

10 I do appreciate your concerns in wanting to  
11 protect these areas administratively, but the reason why  
12 I'm here tonight is that I do feel very strongly that I  
13 specifically want you to recommend that all eight areas for  
14 wilderness in order to insure that their preservation  
15 endures the whims of the administrations in years to come.

16 We're not starting from scratch. We all know  
17 that. This is the last chance for us to preserve a  
18 dwindling, renewable resource for generations to come. As  
19 guardians of these lands, we must rely on your better  
20 judgment and I ask that your final plan will include a  
21 recommendation of wilderness for all of the WSAs. And,  
22 thank you for coming to Denver.

23 MR. SPARKS: Clarifications?

24 (No audible response.)

25 MR. SPARKS: Thank you. David Walder is our next

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1 speaker.

2 MR. DAVID WALDER: My name is David Walder. I  
3 live at 2300 Iris Avenue in Boulder, 80302. Well, first of  
4 all, I, too, am outraged, appalled, upset, and all the  
5 other emotions that we feel because Cross Mountain truly is  
6 an amazing place. I've been there a number of times over  
7 the years and I could try to describe to you all the  
8 wonders of it, but it really wouldn't do it justice. And,  
9 if Cross Mountain doesn't qualify by the BLM as wilderness,  
10 this decision against wilderness must be looked at as being  
11 so discretionary as to approach being arbitrary. It's just  
12 really an outrageous concept after spending time there and  
13 really thinking about what would qualify and what should.

14 I'm, also, very concerned about the process that  
15 brought about this decision and about the people, the  
16 officials, who made this decision. The bias against  
17 wilderness by this RMP is shortsighted and shows lack of  
18 good faith in the process. As I skinned the RMP, I asked  
19 why not more wilderness recommendations in the Little  
20 Snake? The answers found were a fine line of excuses.  
21 They included: other wilderness areas exist close by;  
22 potential, but not proven energy resources are on a WSA;  
23 or, it can be protected through other means; or,  
24 representation of features partially achieved in other  
25 areas. A lot of fine words. I envision that if remote

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1 sections of the Grand Canyon or Yosemite or you pick your  
2 spot were being studied here, they probably would have had  
3 trouble passing your no wilderness test.

4 Going to Cross Mountain, the ACEC doesn't protect  
5 an area like wilderness designation does. Here we have a  
6 fine opportunity to protect it with wilderness and you go  
7 one step below, if it is that close. You know, though BLM  
8 today wants protection of some of the wilderness values of  
9 Cross Mountain, what about your successors who don't feel  
10 as committed to these wilderness values as you do? What  
11 happens in just another administration? We know how much  
12 change can come about and without that wilderness  
13 designation there it just really won't have the true  
14 protection that it needs.

15 To feel that you, gentlemen of the BLM, have done  
16 your duty by recommending only one WSA is hogwash. Really,  
17 Congress enacted the Wilderness Act, FLPMA, and many other  
18 statutes to protect and preserve some of the unique and  
19 wonderful examples of wilderness for present and future  
20 generations. BLM's duty is to everyone, not just certain  
21 special interests which, of course, brings us to economics.  
22 Short term greed versus long term sustainability of  
23 resources values. You know, the energy resource extraction  
24 business funding often has a tumultuous boom/bust effect on  
25 the local economy. I think the people of Craig are quite

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1 aware of that. The economics of wilderness is more long  
2 term and sustainable and to consistently choose these  
3 energy economics that really produce these booms and busts  
4 is ignoring the long term aspect of it. The local economy  
5 can rely on recreation long into the future, long after any  
6 possible wells have stopped producing. 91,000 acres of  
7 wilderness will not have a detrimental effect on the  
8 economy of the nation or Colorado or even Moffat County.

9 What I ask is that you gentlemen recover from  
10 this hearing and others like it by spending a few days in  
11 these WSAs and search inside yourselves and try to find  
12 some of your lost values. I can see that, as you dangle  
13 your feet over the edge of Cross Mountain Canyon after  
14 spending a few nights there away from the hustle and bustle  
15 and the pressures of people like us, you can ask yourself  
16 how should this be in 100 years? What do you really want?  
17 What is best? And, then, I ask you to redo your decisions  
18 in this RMP and recommend all eight WSAs for wilderness.  
19 And, I do have a few questions. One of which is why this  
20 bias against wilderness and it seems to be coming out in  
21 most RMPs around the state where the very small percent is  
22 recommended for wilderness where the report, itself, does  
23 talk about the wonderful wilderness qualities and there's  
24 not a whole lot of conflict sometimes.

25 MR. SPARKS: We won't respond to the questions

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here. If you want to stick around after the session, why, the BLM staff would be glad to --

MR. WALDER: Okay. I'll ask one quick question more since I'm not going to get a response. Is the possibility of a dam any part of the decision process?

And, that's it. Thank you for your considerations.

MR. SPARKS: Yeah, thank you. Any clarification questions?

(No audible response.)

MR. SPARKS: Okay. I'll repeat something we mentioned earlier that when we break after everyone -- after all the speakers are finished, then, the District Manager and some of his staff will be available in the room for questions that need clarification.

The next speaker is Rosalind McClellan.

MS. ROSALIND MCCLELLAN: My name is Roz McClellan. I live at 483 Marine, Boulder, 80302. I moved to Colorado 16 years ago which statistically speaking probably makes me a relative old time resident. I've been following the BLM planning process since 1981 doing volunteer work with -- Sierra Club of the Wilderness Society. I'm pleased that you all came this far to hear our comments tonight and I'm very pleased that you recommended Diamond Breaks for wilderness. I have quite voluminous comments on the RMP format which I don't have

the time to tell you in detail now. I like the distinction between the alternatives compared to some other RMPs which had fewer alternatives and didn't give you such a clear sense of what would be necessary to further one particular direction or another. I felt the range of choices within the alternatives was too small, however, and didn't allow for genuine choices between distinct futures for the region. I felt that many areas have been understudied like archeology and wildlife habitat indicating a possible lack of funding. I thought some were follow through ramifications of the Watt era. And, I notice a tendency in the RMP to emphasize intensive management of soils, watersheds and water quality, timber, natural features, wildlife habitat, forage which I've seen in some other RMPs which alarms me in the fact of possible serious budget cuts. I wish there was some kind of provision on -- enhancement and restoration if we were confident that the funding would be there to implement it. Since that's uncertain, it might be wise in the final RMP to put in some provisions that if funding is not provided, some kind of reductions would take place in the environmentally destructive priorities in the RMP since they wouldn't be able to be rehabilitated. And, from that point of view, the Natural Environment Alternative is preferable if there were to be lower funding.

Regarding wildlife, especially nongame species, I feel that the emphasis on the mineral and commodity development of the Preferred Alternative does not adequately address the importance of maintaining habitat. As stated in the RMP, the resource area contains habitat crucial to many species of land animals, birds, and fish now crowded more and more by cumulative impacts throughout the region from housing and mineral development, grazing, and water pollution. Riparian areas under BLM management are scattered sparsely across the arid landscape of this region and constitute the only safe havens for migratory waterfowl and other specialized forms of wildlife. The BLM has a primary responsibility to insure that these areas under its jurisdiction do not lose their ability to sustain these fragile wildlife populations. Unlike livestock and energy, these species, once gone, cannot be replaced.

I have lots more to say than I'm able to say in the short time. I appreciated the fact that the RMP, perhaps, more than some other RMPs statewide acknowledged the increasing droves of public lands users who depend on public lands for other than consumptive purposes and that the BLM even attempted to derive economic values from their activities. The BLM is involved in a delicate balancing act in attempting to define conflicting demands objectively. It is caught between the pressure for

development coming locally from the bottom up and from the administration from the top down. It has, also, caught between a past which has relied primarily on extracted industries and grazing and a future which many feel will tend more toward recreation and tourism as an economic base. I would like to question an assumption implied in the RMP's brief venture into philosophical speculation on Page 3-85 that somehow local economic needs and the largest societal need to preserve resources are incompatible. Local communities throughout Colorado are finding that recreation can provide both a more environmentally sound and economically stable source of revenue than the traditional extracted economic activities. Recreation, while not as high in rank in the Craig area as it is in the -- well, it's second or third, I guess, depending on Moffat or Routt County, but statewide recreation is second in revenue producing in size. And, may loom larger in the Craig economy as time goes on. And, within the recreation industry, I notice from your charts, that nonmechanized forms of recreations, such as boating and hiking, compete well economically with more developed forms of recreation, such as hunting and ORB use.

The BLM can further the recreation potential of the Little Snake Resource Area by placing more emphasis in the final RMP on resource protection in the RMP and

1 de-emphasizing the more unstable and environmentally  
2 destructive economic options. By upgrading brows and big  
3 game habitat more than you are currently planning and by  
4 active restoration of trout fisheries and other such  
5 activities, the BLM could go far toward achieving harmony  
6 between local and societal interests. To quote Ed Marsian  
7 in the High Country News, "In the west, the time is right  
8 for a major economic shift. The decline of mining,  
9 ranching, of oil and gas drilling and of power plant  
10 drilling has created a partial economic vacuum. It is, at  
11 least, conceivable that extracted economies which destroyed  
12 a land could be replaced by economies which maintain or  
13 enhance the land."

14 In this RMP, I would like to have seen the BLM  
15 take more leadership in this direction. And, I'll be  
16 submitting written comments on my other points. Thank you  
17 for the opportunity to speak.

18 MR. SPARKS: Clarifications?

19 (No audible response.)

20 MR. SPARKS: Thank you. The next speaker will be  
21 Virginia Castro.

22 MS. VIRGINIA CASTRO: My name is Virginia Castro.  
23 I reside at 604 Walsen Avenue in Walsenburg, Colorado,  
24 81089. I'm representing myself this evening. I have been  
25 a Coloradoan for over 18 years and that may not seem like

1 very long since I look like I'm probably only 18 years old,  
2 but I'm 19. My family has lived in Colorado for three  
3 generations off and on, mostly on. One of the primary  
4 reason for returning to Colorado and staying is the  
5 spectacular beauty of the outdoors. Anyone who has visited  
6 the Cross Mountain area, as well as the other seven  
7 Wilderness Study Areas of the region we're discussing  
8 tonight, knows of the beauty our state possesses. I won't  
9 make a long list of facts and figures because I am by no  
10 means an expert. But, I do know what I like and want.  
11 And, I am simply testifying to urge you, the BLM, to  
12 reconsider your recommendations and to recommend that all  
13 of the Wilderness Study Areas be designated as wilderness.  
14 The land needs to be protected for ourselves and future  
15 generations. Thank you for your consideration and time  
16 and, also, thank you for the recommendation of Diamond  
17 Breaks.

18 MR. SPARKS: Any questions?

19 (No audible response.)

20 MR. SPARKS: Thank you. Next speaker is Tamara  
21 Wiggans.

22 MS. TAMARA WIGGANS: My name is Tamara Wiggans.  
23 T-A-M-A-R-A, W-I-G-G-A-N-S. And, I am the Wilderness and  
24 Public Lands Coordinator for the Colorado Environmental  
25 Coalition, formerly the Colorado Open Space Council. I'm

1 really tired. It's been a long day. And, unfortunately, I  
2 don't have very formal or substantive comments to make  
3 tonight. We will be submitting written comments.

4 I'd like to take off my official CEC shoes  
5 tonight and put my hiking boots on for a moment. I haven't  
6 had them on for a while. I'm from Durango. I've lived  
7 down there for about nine or nine and a half years and have  
8 been here in Denver for about six months. And, I can say  
9 without a doubt that my most memorable experiences in the  
10 wilderness have been out in the BLM WSAs, the Wilderness  
11 Study Areas. I don't think there's anything quite as magic  
12 as finding a piece of pottery or finding a petroglyph that  
13 no one has ever found before you or, at least, you'd like  
14 to think that you're the first one that's found it. I've  
15 never been up in the Craig District until last fall and I  
16 went over there to do some hiking with some friends near  
17 Dinosaur and we went out to a place called Wild Mountain.  
18 And, Wild Mountain is one of those areas that the BLM  
19 dropped from consideration because it was too inaccessible  
20 and we liked that quite a bit. We went up to Wild Mountain  
21 and it was truly inaccessible. We spent the night out  
22 there perched on the side of the hillside overlooking the  
23 Green River and it was the most incredible thing because  
24 just vast expanses of land surrounding us on all sides and  
25 not one light to be seen in the darkness except, of course,

1 the stars. You couldn't see one light from where we were  
2 and I thought that was a pretty remarkable opportunity for  
3 solitude. And, in fact, those areas in northwest Colorado  
4 have some of the best opportunities for solitude. When  
5 either you're on top of a mountain or you're inside a  
6 canyon, you're away from pretty much every sign of  
7 civilization out there.

8 These so-called desert areas are not desert  
9 areas, at all. They're teeming with life. In one  
10 afternoon on Cross Mountain, you can see bighorn sheep,  
11 elk, bald eagles, deer, and antelope. We've talked a lot  
12 this afternoon about -- or, this evening, excuse me, about  
13 why oil and gas and this proposed site for the reservoir  
14 and the other reasons aren't good enough reasons, so I  
15 won't go into that.

16 I'd like to say that administrative protection  
17 for Cross Mountain is no substitute for permanent  
18 wilderness designation. Unfortunately, this sort of  
19 pattern -- or, the recommendations we're seeing in the  
20 Draft RMP from the Little Snake area are kind of a pattern  
21 that we're seeing all over the west. We're getting real  
22 dismal recommendations from BLM not only here in Colorado,  
23 but all over the place. And, unfortunately, if Congress is  
24 going to hear the truth about these areas from people that  
25 really know them, they're going to have to hear it from us.

When Congress goes to designate or draw up a wilderness bill, they go and they read testimony like we're all giving here tonight. They go back in the record and they see, you know, umpteen people at a hearing like we are all here tonight testifying in favor of this area. So, I'm really glad to see everyone here tonight.

And, I'd like to make a few more suggestions. I'd like to thank the BLM for coming to Denver. I suspect things are going to be quite different for you in Craig Wednesday night. In fact, understatement of the year. In fact, there are a few people that are in Craig that are sort of connected with the whole wilderness network that we run in this state. When I contacted them about the Wednesday night hearing, actually they told me they were afraid to testify and specifically on Cross Mountain and I think the same pressure that these people out in Craig are feeling are probably the same pressures the BLM is feeling. And, I would just like to say that I hope BLM can make a different recommendation -- give us a favorable recommendation on Cross Mountain after hearing from all the supporters on it and recognize that these public lands aren't just for a few, say, grazing permittees or oil and gas companies, but they're for all of us and for all different kinds of uses.

A few more real quick suggestions. We support a

wild and scenic study of the Little Yampa Canyon. We, also, would like to see grazing reductions if, indeed, the range is in as bad a shape as it appears to be. We, also, support the research natural area for Irish Canyon and thank you for the positive recommendation for Diamond Breaks and hope that we can turn you around on Cross Mountain. Thank you.

MR. SPARKS: The next speaker is Diane Witters.

MS. DIANE WITTERS: Diane Witters, 80 Clear

Creek, #7, Golden. I am speaking for myself tonight as a person that grew up in Wyoming and who has a growing appreciation for the very rare wild areas that some parts of the Rocky Mountain west offer us here. And, this is my very first public hearing and I'm a little bit awed by the opportunity that exists for people to stand up and give their very heartfelt concerns about a place in Colorado that's particularly rich especially in its ecological and aesthetic (phonetic) values and I just want tonight to reiterate a point that's been applied so many times by a lot of speakers and that is that as humans we are one particular species, one species. Among many others who have a tremendous degree of power in our hands and we can choose to either protect and respect the rights of other living species or else we can choose to deassimate them. In wilderness areas, our prime place is to show that we do

really respect plant and animal life that is relatively untouched by human intrusion and there are precious few of these areas left amongst the billions acres of land that have been overtaken by human activity. We owe it to our fellow species, as well as to ourselves, to support the designation of wilderness areas and Cross Mountain and the other seven areas we're addressing tonight are very appropriate places to do just that.

MR. SPARKS: Are there any other statements?

(No audible response.)

MR. SPARKS: If there are no more statements, this hearing is adjourned. Thank you for taking your time and for presenting this information to us. As I stated earlier, if any of you have questions, we'd move into the informal period and Bill Pulford, the Craig District Manager, and his staff are here and, if there's anything you'd like to ask, I'm sure that they would do everything that they would to provide the answers to the questions that we wouldn't respond to because of the mechanism of a formal hearing. So, thank you. Thank you all for coming.

(Whereupon, the public hearing in the above-entitled matter was adjourned.)

# CERTIFICATE

This is to certify that the attached proceedings before:

U.S. Department of the Interior

Bureau of Land Management

In the matter of: Public Meeting: Little Snake Resource

Management Plan Environmental Impact and

Wilderness Technical Supplement

At Denver, Colorado, Date March 10, 1986

was held as herein appears, and that this is the original transcript thereof for the file of the Department.

*Scott Hill*  
OFFICIAL REPORTER

PUBLIC MEETING HELD MARCH 12, 1986, AT CRAIG, COLORADO, FOR THE UNITED STATES DEPARTMENT OF INTERIOR, BUREAU OF LAND MANAGEMENT TO RECEIVE INFORMATION AND COMMENTS ON THE ADEQUACY OF THE DRAFT LITTLE SNAKE RESOURCE MANAGEMENT PLAN AND THE WILDERNESS TECHNICAL SUPPLEMENT TO THE RESOURCE MANAGEMENT PLAN.

BUREAU OF LAND MANAGEMENT  
PERSONNEL PRESENT:

Forest W. Littrell  
Bill Polford  
Glen Sekavec  
Greg Goodenow  
Duane Johnson

**Nancy Lutz Schurman**

Court Reporter  
Box 4512, 345 Sixth Street  
Steamboat Springs, Colorado 80477  
Telephone 879-8070

Are there any questions on the hearing procedures? If there is, I'll answer them now.

We'll then proceed with the presentation.

Again, I want to say, please begin your oral statements by stating your name, address and the organization that you represent, if there is any other than yourself.

Our first speaker this evening, we want to give elected officials the first opportunity to speak first, and I will ask you to come forward, and I understand that Tom LeFevre is the elected official who does want to speak this evening. Tom, if you'll come forward. By the way, before Tom starts, I do have three cards over here, and I will be holding them up so you'll have an idea of how much time you have left to speak.

MR. THOMAS F. LEFEVRE: I'm Tom LeFevre, a Moffat County commissioner. The Moffat County Commissioners want to go on record tonight to keep the Cross Mountain Canyon in the multiple use. We figure that there's an energy source there that we can't take away from our kids and their kids, and we want that on the record. While I'm up here, read some numbers off the report that Mike Strang sent out. He asked the people in his district, what do you think about, or do you want to increase wilderness, leave it as it is, or decrease it? Fifty percent of these people that answered

this report, they said, leave it as it is, and 12 percent, they said decrease it. That's 30 percent wanted the increase, so there you got two to one to leave it as it is or take it away. Thank you.

MR. LITRELL: Thank you, Mr. LeFevre. Are there any other elected officials in the house who would like to make comments this evening? Okay, our next speaker will then be Mark Pearson representing the Sierra Club.

MR. MARK PEARSON: My name is Mark Pearson. My address is P. O. Box 204, Grand Junction, Colorado 81502. I'm chairman of the Rocky Mountain Chapter of the Sierra Club, which has 7,000 members in Colorado, many of whom use the public lands in western Colorado and in the Little Snake Resource Area for recreation and other forms of enjoyment of public lands. I'm going to focus my comments on a few specific items in RMP right now and I'll send in written, more specific comments at a later time.

I wanted to compliment BLM on its wilderness recommendation in favor of Diamond Breaks. We support BLM's recommendation and its boundaries for that wilderness study area; however, we're extremely disappointed by the wilderness recommendation for Cross Mountain.

We feel that it is not supported by any sort of

substantive reasoning. In fact, what BLM has put in the document is flimsy and transparent. The BLM has emphasized minerals to an extreme amount in this management plan. Cross Mountain, as BLM should know, is without a doubt one of the preeminent wilderness candidates in Colorado due to its combination of unequaled recreation, wildlife, ecological and scientific values. There are no other areas in Colorado which offer the range of recreational opportunities from white-water boating to hunting to caving. There are no other areas which offer wildlife habitat for such a diverse range of big game animals such as big horn sheep, antelope, deer and elk. There are no other areas which are home to as many endangered species of fish, birds and plants as is Cross Mountain.

Against these documented wilderness-related values BLM offers speculative, unproven oil and gas reserves, reserves which are confirmed by no publicly-available published data. How can BLM expect us as the public to swallow the hugely inflated dollar figures of the RMP for unknown and unproven resources? There is not similar treatment given to the economic value of recreation on public lands. Recreation is one of the major growing industries in Colorado and is not subject to the economic downturns of the mineral industry.

and the livestock industry. The arid country of the intermountain west such as found in Cross Mountain and the Little Snake Resource Area is growing increasingly popular with recreationists, and if it is managed wisely and BLM does not allow those features that make the land special to Cross Mountain be destroyed, then Craig and other local communities around it can expect to reap increasing business from that growing segment of the Colorado economy.

The vast majority of the two million acres of public minerals in this resource area is open to mineral leasing. There's no reason that Cross Mountain needs to be sacrificed for potential mineral development. The mineral emphasis of the RMP is demonstrated simply by the amount of space allocated to mineral discussions in here. You have 34 pages just on minerals, which is more than the combined total for wildlife, recreation, cultural values, wilderness and natural history, and I think that's also pointed out by the fact that the only changes that have been made to this RMP since the working group that met last September here were those changes made to appease the mineral industry. The only other change in here was in favor of the livestock industry, a change in an allotment that had been slated for wildlife emphasis to a livestock emphasis.

Well, in my last minute I wanted to talk about the livestock program up here. I spent the day looking through the range program files of the Little Snake Resource Area, and I was appalled. The program up here has been a shambles. There are livestock grazing bills that have been delinquent more than a year. There are range projects that have been built in the wrong locations. There are range projects that were built without authorization for environmental review by BLM. There are trespass cases that have been going on for decades that have not been pursued by BLM. I think the public should be told just exactly who in the range department was in charge of the program when these abuses were occurring. I think the Sierra Club's going to be taking a very active interest in the administration of the range program up here, and as part of this record, I'd like to request that I receive every environmental assessment for every range project for every allotment in the Little Snake Resource Area from now on.

It's quite astounding that BLM can come up with hundreds of range improvement projects in the back of documents here claiming that they have specific information showing that those are needed when they don't have enough specific information showing that reduction should be made in those allotments, and I'll

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supplement my comments with written comments later, but thanks.

MR. LITRELL: Thank you, Mark. Hugh Newton representing himself.

MR. HUGH NEWTON: My name is Hugh Newton. My mailing address is Box 1723, Steamboat Springs. I'm representing myself.

First of all, I'd like to support the BLM in their designation to wilderness of the Diamond Breaks area. I've hiked in that area on a few occasions, and it was quite a nice area, and it does have all the qualifications there. I'm also rather surprised that Cross Mountain wasn't included in it. It's one of the most unique areas in the whole Craig District. Like Mark said, it has, it's one of the only areas in the state where you can find all four major big game -- well, you can find all four species of the big game here in Colorado, the antelope, the deer, the elk, the big horn sheep. I don't think that the multiple use designation would -- you know, it would offer some protection, but it would still allow the oil and gas exploration in that area, and right now I think that would destroy the wilderness values that are there currently. It would destroy some of the wildlife characteristics. I don't think big horn sheep would stick around too long around

B-4

there with the big drilling rigs that go up are in that area.

Currently right now there's roughly 1.8 million acres in the Craig District available to oil and gas leasing. Cross Mountain would only offer another 14,000 acres or just over that, which is only about one percent of the available acreage right now. It doesn't seem like that's a whole lot to lose to wilderness. The wilderness values aren't replaceable, and right now the oil and gas, there seems to be quite a big area open to that right now.

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Also, with the physical layout of Cross Mountain, I don't see why the oil and gas people couldn't drill in with their technology they have these days, they couldn't drill outside the boundaries and drill in at angles if they did indeed feel that there was a large reserve underneath the area.

There was quite a bit of public support for the wilderness designation for Cross Mountain, and I question why the BLM, who they are representing when they throw it out. They themselves rated it very highly for a wilderness area.

On the grazing, just looking through your book or through the thing there, currently there's approximately 37 percent of the acreage in the Little Snake

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Resource Management Area is classified as unsatisfactory with another 33 percent that hasn't even been looked into closely, and only 30 percent of it was rated as satisfactory. So the inventoried area, that's more than 50 percent of it is rated under satisfactory. So I think there needs to be something done or looked into as far as restrictions as far as the grazing, and I've seen several areas, you know, hiking and hunting in the area to where it's been evident.

Now, as far as the riparian habitat, I feel that there needs to be something done to protect some of that from the over-grazing, possibly some fencing or something like that. Right now the cottonwood stands aren't coming back. A lot of the shrubbery and the likes haven't been, you know, it's just not reproducing. I've seen areas on private land in North Park which have been fenced and the riparian habitat is in quite good condition there. Maybe something like that could be implemented here.

I looked into the economics of the oil and gas in this area. Currently, or 1980 figures, 1.1 percent of the people in the district or approximately 160 people were employed directly with the oil and gas area. That's out of 14,660 people. And in 1986 they're going to be closing between 2- and 4000 producing

oil wells. So with that type of a trend, it seems that the wilderness designation would be in order for Cross Mountain.

I also support your ACEC for Irish Canyon, support the Limestone Ridge RMA, support your wilderness designation for Little Juniper Canyon or Little Yampa Canyon, and I'd like to thank you for the time. I'll also be sending in a written comment or a written statement to supplement this.

MR. GLEN SEKAVEC: Excuse me, Hugh, I have a question. There are a lot of miles of riparian habitat in the Little Snake Resource Area, the Little Snake and other tributaries. You spoke about the habitat. Do you have specific areas in mind, or in your written comments, will you provide them to us?

MR. HUGH NEWTON: I will put them in the written comments, if you'd like.

MR. GLEN SEKAVEC: Put in those specific areas.

MR. HUGH NEWTON: Yes. One of the areas I'm thinking of is along the Little Snake, be north of Little Park, in that area there, be the west side of Cross Mountain from 318 south actually.

MR. LITTRELL: Thank you, Hugh. Is there any other questions from the panel? Sam Rinker.

MR. SAM RINKER: I'm Sam Rinker. I'm at Box

51, Maybell. I'm a rancher. I live in that area right across the mountain, I guess. We've heard comments here tonight on the amount of game that are on that mountain. If you want to go down there any time of the day you can count the, in the wintertime, the game in my fields from ten o'clock till noon, the elk and the deer. They do not eat on Cross Mountain; they eat on my fields. If you want to check, I can sure prove it.

My folks have been there since the turn of the century, and I agree on some of that range in the condition that the range is in, but we are taking the blame for this, and within my lifetime I've seen as many as 700 head of extra cattle in there that were not permitted, and there was no way we could get rid of them. There was no legal way of moving them, and when we take the blame for what somebody else does, I think you're getting out of line.

Since I have had control of that, I've had the land in there that's leased, the lease that belongs to Bogles Barms (spelling phonetically), and I will challenge anybody to prove that that range has gone downhill. As far as Cross Mountain being different, having different type of things, as far as geology, there's some geological that are available no where else in the world, but as far as the difference in the

livestock or the habitat, there's a considerable area in that part of the world that is that same type, and the main purpose as far as I can see in your wilderness area is not to protect the wilderness, which I am for, if you'll do it strictly to protect the wilderness area, but to provide recreation for somebody, and right now you have recreation available in Dinosaur National Park and nobody is using it because we have complaints from the Parks Service that it should be changed into a park system, we could get more people using that wilderness area. I question whether it's necessary to provide more wilderness area for recreation in an area where they are not using it now. Thank you.

MR. LITTRELL: Any questions of the panel for Sam? Thank you, Sam. The next individual will be Louise Miller representing herself.

MRS. LOUISE MILLER: My name is Louise Miller, address is 41380 Highway 13 North, Craig. I'm representing only myself. I will address only the Cross Mountain question.

I desire three characteristics in any proponent in all proponents, of whatever. Number one is honor. A generation ago there was a proposal to build Echo Park dam in the heart of Dinosaur National Monument. In resolution of the matter the opponents of the dam,



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the conservationists, made a concession: they would never oppose the development of the Juniper-Cross Mountain areas. The industrialists, government and other proponents of the dam also made a concession: they did not build the dam. I wish that the present-day conservationists would honor the commitment of their fathers and leave off their objections to development of the Cross Mountain area.

Number two is honesty. I have in my hands two publications: Peak and Prairie, the publication of the Sierra Club Rocky Mountain Chapter, and a release from the Colorado Environmental Coalition. Obviously, one or the other committed plagiarism because identical wording is found in both. But back to my desire for honesty. One of the remarks made is, to quote, "Cross Mountain is home to antelope, mule deer and elk, perhaps the only place in the state where all of these big game animals are found together." Many ranchers in Moffat County have all these three species on their property.

Number three is courtesy. Quoting from Peak and Prairie: "For BLM to recommend against wilderness for Cross Mountain makes a mockery of any credibility the wilderness study program might have had and indicates the depths to which the agency's supposed professional impartiality has sunk," end of quote.

B 30

The BLM personnel has toured the, or traversed the area -- can't read my own writing -- has traversed the area by foot and motorized vehicle, has listened to cars and trucks traveling on nearby highways and roads, has viewed development that can be seen in and around the area. The all-purpose advisory committees have viewed the area, studied maps, researched past and probable future development. Such activity does not make a mockery of the credibility of the BLM, but the statement I've just quoted does indicate discourtesy and also dishonesty.

The desire for wilderness has to be balanced against the desire and even the need for the development of natural resources for eating, heating, housing, clothing and traveling and recreation of types available in non-wilderness areas. I agree with the decision of the BLM.

MR. LITTRELL: Is there any questions from Louise from the panel? Thank you, Mrs. Miller. Bob Lyons.

MR. BOB LYONS: My name is Bob Lyons. Most of the people in here know me. My address is 729 Green Street, Craig, Colorado. I've got kind of some questions for this gentleman right here on some comments he made if he cares to answer them.

B 31

MR. LITTRELL: I would like to limit this just to comments at this time, Mr. Lyons. We will have available after the hearing --

MR. LYONS: Well, I'll make a comment on the direct route then. I am opposed to putting this, these areas into the wilderness. I think it should be maintained in a multiple use fashion. Most of these people that operate on this public land, forest and BLM, do a reasonably good job of taking care of it, and they've turned so much recreation into these high countries and the forest in the summertime that the wildlife such as your deer and elk are not going to these wilderness areas. They aren't there; they're on private ground all the time, and I think the present economy of the United States of America, they're putting too damned much emphasis on recreation, and I am opposed to adding any more wilderness to most of these areas. There's some of them they might put a little bit more into, but as far as going to all the trouble and expense, I think the federal government would be a lot better off if they'd spend a little bit more of that money trying to fix up water holes and such on BLM ground. Thank you.

MR. LITTRELL: Is there any questions of the panel of Mr. Lyons? Thank you, Mr. Lyons. Ed

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Takkington.

MR. ED TAKKINGTON: My name's Ed Takkington, 592 Stout Street here in Craig. I'm just here on my own. I'd first like to applaud the Diamond Breaks designation as a wilderness area and would like to see the Cross Mountain Canyon be designated as a wilderness area. I don't think the multiple use would go far enough to protect that very unique and beautiful canyon, and that's about it.

MR. LITTRELL: Any questions of Mr. Takkington? Thank you, Ed. Dean Visintainer.

MR. VISINTAINER: My name's Dean Visintainer. My mailing address is P. O. Box 395, Craig 81626. I'll have a written statement later. I've got a short comment to make tonight on the RMP, and I might start off with your opening statement that this is a comprehensive land use plan. My interpretation of what an RMP is that it deals with managing and allotting the resources on public lands. I think that you cover some of our private land with different designations and through conversations you have changed some of these, one in particular to FWCA and some to water and, or soil and water. This affects our ability to make a living on the land. It affects the amount of money that we have to spend in the community, and

B 33

I think that by your designating this, even though at the bottom you have a comment that this applies to the mineral estate only, some of the map covers private land where we own the mineral interests. I think it's a step on our use of private lands and a means of control some day down the road.

MR. LITTRELL: Is there any questions of the panel of Dean?

MR. POLFORD: What area are you talking about?

MR. VISINTAINER: North of Craig, Township 8 North, 9 North.

MR. JOHNSON: Dean, you're talking about the ones where we show submineral estate?

MR. VISINTAINER: Yes.

MR. JOHNSON: And that we also show a concern for soil and water?

MR. VISINTAINER: Yes. You do both. You have part of it on soil and water, part of it on FWCA.

MR. JOHNSON: Okay.

MR. VISINTAINER: But you didn't delineate in any of your maps, even your smaller maps, the fact you didn't delineate our private mineral rights.

MR. LITTRELL: Thank you, Dean. Charles Sis.

MR. CHARLES F. SIS: My name is Chuck Sis. My address is 2611 County Road No. 30 here in Craig.

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I didn't think I was going to talk, so I don't have a prepared statement. I would just like to commend the BLM on their designations as they have. I would like to go on record, I'm just representing myself, as being opposed to the designation of the Diamond Breaks area as a WSA area. I think the BLM is doing a very good job keeping its multiple use, and I think that's the way that the BLM properties ought to be. I very strongly am opposed to the designation of the Cross Mountain area as a WSA area. I think, again, as somebody mentioned that if we don't have the need for the power and the energy today, we will in the future.

Again, as somebody's already stated, there is sufficient recreation opportunities for those that go in for that sort of thing. I like to hunt and fish. I like to see wild game. I think every rancher here would consider himself to be an environmentalist. If he wasn't, he wouldn't be protecting himself for the future.

I would like to make mention that it seems that everybody who's in favor of this -- and I used to be that way myself -- is very young and athletic. I'd like to caution you that someday you're not going to be that way. You're going to be old and flabby, and you're going to have to look at what your actions are today.

B 35

Thank you.

MR. LITTRELL: Any questions of Mr. Sis? Thank you. John Randolph.

MR. JOHN RANDOLPH: My name is John Randolph, Box 95, Steamboat Springs, Colorado. I am representing Northwest Rivers Alliance, an environmental consumer citizens group in Steamboat Springs. I'm young and healthy and not flabby; however, I believe there are some wilderness values that haven't been discussed tonight other than recreation. What I'd like to mention is that Cross Mountain, Diamond Breaks, Cold Springs, and all the Dinosaur contiguous wilderness study areas are being recommended for wilderness or not, but they were considered for wilderness because of wilderness qualities that do not necessarily mean their ability to sustain recreation by recreators. These values include the wildlife, water quality, plants, the geology, etc., and whether or not somebody is recreating on these areas, these qualities are best protected by wilderness designation in many instances.

I'd like to go on record as happy with the Diamond Breaks recommendation. I think it's a good recommendation, and I like the boundary. I think the Cold Springs recommendation is terrible. Cold Springs Mountain is a very unique area. The wildlife on Cold

B 36

Springs is probably one of the best wildlife areas in the state if not in the country. Cold Springs is being recommended for oil and gas development and for grazing and then just a part of it for wildlife, but any part of it could be developed for oil and gas, and I think that could severely hamper the wildlife, the water quality in Beaver Creek and many of the features that are up there now, including the hunting. The area supports a trophy elk area, which under current practices might not last.

I also believe that the Cold Springs Wilderness Area should include the east portion all the way to Irish Canyon. I know that was dropped earlier and there's nothing BLM can do about it now, but I'd like to go on record as supporting that and, hopefully, that can still happen. Cross Mountain should also be wilderness. A large majority of the public supports it, even though I know in this room there are many local people who do not support it, statewide it's a very popular area. Probably no other place in the state of BLM areas represents wilderness values as well as Cross Mountain does. I've been up there many, many times, all times of the year, and am continually amazed at what Cross Mountain has to offer, not just as a place for me to recreate but as a place that supports incredibly diverse and healthy wildlife, birds, fish and other wilderness

B 37

1 values.

2 The proposed recreation management area does  
3 not sufficiently protect these features where oil and  
4 gas development could take place and ruin a lot of  
B-11 5 these values. The ACEC recommendation for the Cross  
6 Mountain Canyon is the best that can be done administra-  
7 tively, but it does not protect the canyon from adminis-  
8 trative changes, and I think a wilderness designation  
9 for the whole area is the only plausible designation  
10 for Cross Mountain.

12 I applaud the BLM for recommending the Little  
13 Yampa Canyon for a recreation designation; however, I  
14 believe they should also consider it for wild and  
B-12 15 scenic river designation. The area's becoming more  
16 and more popular with boaters. It supports a very  
17 healthy wildlife population and I think it would help  
18 the tourism economy in Craig. BLM's heavy bias towards  
19 oil and gas development I believe makes a mockery of  
20 the multiple use concept. Oil and gas is very  
22 important both nationally and regionally; however, 97  
B-11 23 percent of the oil and gas mineral lands within the  
24 resource area are open to oil and gas development, and  
25 to use that as an excuse for not recommending Cross  
26 Mountain as a wilderness area is ridiculous. Also  
27 it's been used both in Cold Springs and Cross Mountain  
28

B 38

1 not to recommend for wilderness because they could not  
B-11 2 develop water for big game, particularly big horn sheep  
3 herds, which I think is a ridiculous argument for not  
4 designating wilderness.

6 I think the Irish Canyon ACEC is good protection  
7 of geologic and archeologic features; however, as I  
8 said earlier, I think the Cold Springs Wilderness Area  
9 should extend all the way to Irish Canyon. As was  
10 mentioned earlier, overgrazing on BLM land is a problem,  
11 and over 50 percent of the grazing land inventory is  
12 considered unsatisfactory by the BLM yet no reductions  
13 in AUM's are proposed. I think there's a problem there.

15 The alternatives considered in this RMP  
16 do not necessarily give you the combinations that could  
17 be used for the preferred alternative, and I believe  
18 other combinations of resource priorities could be  
19 developed, and I also would like to go on record as  
20 supporting the fact that riparian areas should be  
21 federally protected from overgrazing by either fencing  
22 or whatever. Thank you. I will supplement this with  
23 a written report.

25 MR. LITTRELL: Thank you, John. Are there any  
26 questions from the panel for John? Wright Dickinson.

27 MR. WRIGHT DICKINSON: My name is Wright  
28 Dickinson. I live at 1483 County Road 10 North, Maybell.

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1 Colorado. I'm representing my outfit, my ranch, Lazy  
2 VD Land and Livestock. I first want to say that I have  
3 the feeling that in the overall plan book that we have  
4 here, the Little Snake Resource Management Plan and  
5 Environmental Impact Statement, that it is basically  
6 geared to the non-paying users of the federal lands,  
7 not the paying entities.

9 I also would like to point out inconsistencies,  
10 and to use one specific example, when they put the  
11 boundary of the Cold Springs WSA, they came south until  
12 they hit an old wagon road, and they said that was the  
B-13 13 first infringement of man so that was the boundary. If  
14 we cross south into the Diamond Breaks area, there's  
15 another, same road that went to a homestead that was  
16 never proved up on, the same kind of road, and they chose  
17 to ignore that and bring the boundary clear to the  
18 wildlife fence boundary. I only point that out as one  
19 of many inconsistencies.

21 I was asked -- I'm going to address now the  
22 special management areas, and I was asked by the BLM to  
23 have breakfast with the board of directors of the  
24 Colorado National Area Programs. This is two years ago,  
25 and we met with them and discussed the various areas  
26 that are addressed here, Irish Canyon, Hink (spelling  
27 phonetically) Springs, Limestone Ridge, Vermillion Creek,  
28

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1 Vermillion Bluffs, Lookout Mountain, Gee Gap and etc.  
2 The people that were there told me that they thought  
3 the plants that you have on your endangered list were in  
4 good shape and that in this particular case our cattle  
5 graze in these areas, and as I have been told by the BLM,  
6 they plan not to fence these, and I applaud them in that  
7 because I think we have been taking good care of these  
8 areas.

10 Something that bothers me, at the end of every  
11 paragraph of these they say remaining stands are  
12 threatened by livestock grazing. I'm quoting now Lime-  
13 stone Ridge, and in here one place they say Limestone  
14 Ridge is a critical winter range for elk and has been  
B-14 15 identified as an elk concentration area, yet there is  
16 no, in the, at the end of any paragraphs of any of these  
17 special management areas have you said anything about  
18 any damage by wildlife. Always we come back to the  
19 remaining stands are threatened by livestock grazing.  
20 That's an untruth.

22 Once again, the people that were brought here,  
23 this Board of Directors of the Natural Areas Program,  
24 felt that they were in good shape, and the reason that  
25 they are in good shape, we as users of the federal range  
26 take pride in taking care of this land, and it's our  
27 livelihood, and if you think we're going to abuse it, we  
28

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1 just don't do that, and if anybody doubts that, they're  
2 welcome to tour any of these areas, and there's proof on  
3 the ground that they haven't been abused.

4 MR. LITRELL: You're down to a minute, Mr.  
5 Dickinson.

6 MR. DICKINSON: Okay. With that I'll close.

7 MR. LITRELL: Is there any questions from the  
8 panel of Mr. Dickinson? Thank you. Dan Randolph.

9 MR. DAN RANDOLPH: My name is Dan Randolph,  
10 Box 1057, Steamboat Springs. I also would like to say  
11 about Cold Springs, the elk herd there is a trophy elk  
12 herd, and I think the wilderness designation should be  
13 given to it. I think the Irish Canyon ACEC is good as  
14 well as the Limestone Ridge RMA. I wish it was more,  
15 but those are good.

16 B-15 On Cross Mountain I'm an adamant supporter for  
17 wilderness designation. I think it's an incredibly  
18 unique area for all the reasons that have been said by  
19 everyone else up here. There have been three dry wells  
20 in the area recently, and there's been no proven  
21 resources there, and since that's the main reason for  
22 setting it aside as not WSA seems weak, and leaving it  
23 as a recreational management area leaves it open to  
24 future pressures by developers.

25 I also want to stress that the reasons for

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1 wilderness and the protection are not for recreation  
2 necessarily. Its wilderness designation is to protect  
3 wilderness for non-human life as well, and the parts of  
4 Dinosaur National Monument that are used are the canyons  
5 and the campsites. You can hike half a mile further  
6 than that and it's not used, but in that half mile you  
7 see evidence of overuse even though it's well controlled.  
8 So recreation to any large extent is dangerous in some  
9 of this area, which means that it needs to be more  
10 protected, more reason for it to be wilderness. And  
11 the same as energy use for future generations, so is  
12 wilderness, so is protecting the different forms of  
13 life other than human life, and just like our future  
14 generations, we'll need energy, they also will need  
15 other wildlife around them.

16 I also want to say the Vale of Tears, which is  
17 one of the areas that is being dropped, and if it is  
18 not considered now will not be considered in any other  
19 form. I think it's a very unique area and very  
20 beautiful, and it's incredibly fragile. I think if it  
21 is not protected, it can be destroyed quite easily, and  
22 since it is bordering on the monument, it adds much  
23 protection for the monument as well.

24 MR. LITRELL: Is there any questions of Mr.  
25 Randolph from the panel? Thank you, Mr. Randolph. We've

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1 had a request or two. Maybe we could all kind of stand  
2 up and stretch and take about a five-minute recess, get  
3 a drink of water and come back and go again.

4 (A short break in the proceedings was  
5 taken, after which the following transpired:)

6 MR. LITRELL: I'll now call Gerald Culverwell  
7 up to testify.

8 MR. GERALD CULVERWELL: I'm Gerald Culverwell,  
9 Box 505, Craig 81626. I represent myself. I'm con-  
10 cerned about the recreation designation of the Little  
11 Yampa Canyon. It seems that this places a land use  
12 designation on the deeded land that surrounds or borders.  
13 As a landowner in the area, this concerns me because of  
14 possible condemnation. This plan states for the possible  
15 acquisition of land or right-of-way by trades and  
16 doesn't give much room for settlement, in my opinion.

17 There's also the need of, for maintenance  
18 reservations should this become a designation because  
19 of the Duck Mountain Tunnel and other private land in  
20 the middle of this designation. This designation would  
21 also restrict the use of livestock, thus reducing the  
22 monetary income for the BLM. The Flat River water is  
23 the main consideration here. There's a lot of the same  
24 type of recreation around the area.

25 As for the riparian boundaries, it's not

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1 possible to fence the area because of the wildlife in  
2 the area. There would be more damage done by the elk  
3 and deer than ever by wildlife, or by livestock.

4 I'm opposed to the canyon recreation because  
5 of the possible, possibility of the Juniper Dam somewhere  
6 in the future. If this should come about, all of this  
7 just adds cost to the taxpayers and consumers alike.  
8 It seems to me that this whole study is slanted toward  
9 the use of the freebies rather than the paying public,  
10 which is the livestock, oil and gas people, the mine  
11 operators, forestry operators. I think everybody that  
12 uses public land should have to pay for it. I don't  
13 care if it's the Division of Wildlife, the hunters,  
14 hikers, recreationists, wilderness users, whoever,  
15 everybody should have to pay for it. Thank you.

16 MR. SEKAVECK: I have one question. Jerry,  
17 you said on the private land in the middle of your  
18 statement, you said something about that the private  
19 lands around the Little Yampa Canyon were covered with  
20 a designation?

21 MR. CULVERWELL: I have some land in the  
22 middle of that, three different tracks up and down the  
23 river and that bordered on the north.

24 MR. LITRELL: Any other questions of the panel?  
25 Thank you, Mr. Culverwell. Rich Atkinson.

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MR. RICHARD ATKINSON: My name is Richard Atkinson. I represent Colo-Wyo Coal Company whose address is 5731 State Highway 13, Meeker, Colorado. Colo-Wyo Coal Company employs approximately 400 people at a mine that is between Craig and Meeker. We mine in excess of 3 million tons a year of federal coal from the Colo-Wyo mine. Colo-Wyo is committed to protecting the environment while economically mining coal, which has been evidenced by numerous environmental awards.

We appreciate the opportunity to comment on this RMP, and I will reiterate some of the comments that we made informally earlier this year. We do appreciate some of the changes that were made in response to those informal comments and for the effort that the Bureau of Land Management has made in obtaining public comments on this document. We will provide specific comments prior to May the 9th to follow up on my general comments.

One of our major concerns is the same as we have just heard. This document has a definite negative approach and outlook towards those who derive their livelihood from the public lands, industries which provide thousands of jobs in northwestern Colorado and generate millions of dollars of rentals and royalties

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to the general public, half of which comes back to the State of Colorado and a portion of which comes to the local counties. We feel that those who derive their livelihood from the public land and who generate these revenues should receive a more fair treatment. Any negative impacts from coal development have been magnified in this document while beneficial impacts and economic impacts and impacts of energy production are essentially ignored. Contrary to other comments received tonight, this document hinders more than it enhances any future coal development.

We object to the designation of the Upper Little Yampa Canyon unit as a special recreation management area. We do not believe that the section of the river from the confluence of the Williams Fork River to the confluence of the Milk Creek would qualify as eligible for protection as a management, for protection management as a special recreation area. Since the Bureau of Land Management only controls a narrow strip of land in this area, there's already power lines and numerous roads, a major railroad, numerous agricultural improvements, which would make it far from the semi-primitive designation that it has received. If this change is not made, we will be compelled to protest this document in this area.

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In addition, the RMP states that there's over 600,000 acres of lands available for coal development, and while this seems like a lot of acreage, there's a lot of that that doesn't have any coal under it, and further, these areas that are designated for coal development would be very much hampered by the adjacent areas that are being designated for wildlife habitat, soil and water protection or recreation. The RMP should address the necessity to allow transportation corridors for coal areas through other RMP management areas in order to transport coal to market, provide transmission lines, water supply access, access for employees, and supplies and services.

We object to the use of the visual resource management classifications that assume that any activity by man will produce a negative visual impact regardless of, irregardless of its location. While this may represent a purist attitude, we believe that it does not reflect the views of the general public and particularly the residents of northwestern Colorado. Further, in areas where no mineable reserves exist, we do not desire that coal be designated as the primary land use. Likewise, we encourage the BLM to continue to take the same approach towards wilderness designation. If it doesn't meet the wilderness criteria, we don't believe

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it should be designated as such.

I would like to add that I've personally spent a lot of time on Cross Mountain and that I agree, I think it's an interesting area, but it's far from reaching the wilderness criteria. Thank you.

MR. LITTRELL: Are there any questions of the panel for Mr. Atkinson?

MR. SEKAVEC: You said that management protection areas should not be designated for coal where no coal exists. Do you folks and other coal industry in the area have information to supplement our information to help us delineate those areas where coal exists?

MR. ATKINSON: Well, some of it just could be obtained from the general geology maps that have been prepared, and I'm sure that you have them. The areas that you block out, these large areas of coal particularly north of Craig that there's no coal that would be mined there in the foreseeable future. I think that the information that we would have would be the same information that the Bureau of Land Management already has.

MR. SEKAVEC: Okay. Thank you.

MR. LITTRELL: Any other questions of the panel? Dale Kruse.

MR. DALE KRUSE: My name is Dale Kruse. I

live and work in Craig. I represent a group of people in Craig called Friends of the Yampa, and we're a group that is trying to see that the environment around the Yampa Basin is protected a little bit.

We agree with the Diamond Breaks wilderness designation bordering on the park, or as they want to make it a park. It's probably an excellent idea. Cross Mountain is a very small area to remove from mineral, oil and gas development and probably is less than one percent of the resource in the RMP while it's potential for recreation, wilderness, naturalness and solitude is excellent. Our children would enjoy visiting such an area left as it is, and also in support of the Little Yampa Canyon, we believe that that designation is an outstanding natural area, as written up would be at least some protection for the canyons down through that area. We'd like to see the visual corridor down through the river left natural and, again, as we work in the area as the last person stated, we also live in the area, and it's important for the people in this area to have an outstanding area such as this for recreation and solitude and not just another place to go to work, preserved and left natural for our children even when we're old and flabby.

MR. LITRELL: Any questions of Mr. Kruse from

the panel? Thank you. Tom Kourlis.

MR. TOM KOURLIS: I'm Tom Kourlis, 303 Sand Rock Drive, Craig, Colorado, representing the Kourlis Ranch. There's been a lot of things that have been addressed here, and I think before you can make decisions or the BLM can make decisions, I think they have to have accurate data. For example, the data that's incorporated as far as economic projections, the result of increased recreation, the charts and everything include, for example, the ski resort at Steamboat Springs. That does have an impact in Steamboat Springs. I don't know if you can make the assumption if you enhance recreation that that same amount of magnitude of money will project out into the western part of this resource area.

There are certain contributions that are made in this economy by the paying people that do utilize public lands or public minerals. They pay here. They contribute to this economy. They contribute outside this economy. I'm a rancher. I contribute here. Practically everything I generate, if I make enough, I spend here, and if I don't, I borrow it and spend it anyway. The thing that happens after my lambs leave this area, it also shows a certain degree of benefit to the people that work outside this area. We food and we clothe people, we give them jobs outside of this. I think if you're

going to make an impact and change things with the livestock to recreation or wildlife, when you're considering that in a monetary sense, you should include the impact that we contribute on a nationwide basis because in return to that, you're only reflecting the potential benefit of recreation coming this way.

Addressing wildlife, I ranch <sup>next</sup> to, as a matter of fact, Colo-Wyo Coal. I think we have been wildlife conservationists. We've protected them. In our area when I grew up and I was 14 years old, drew my first license, I worked for a week and never saw an elk. In our area right now you can go over there and you can have your eyes closed and just drive down the road and see a hundred. Game and Fish has numbers changing from zero to 1600 in the last five years. That impact, if we were not conservationists, if we were not environmentalists, as far as the livestock users, it was designated livestock. It has been for the last 20 years, and we've had an enhancement of livestock, an enhancement to wildlife because of livestock. We care about what we use. That's our future. We abuse it, we not only lose the permit, because they're obligated to BLM range cons and who are obligated to maintain it, we also lose our livelihood. If you want an incentive, think about your livelihood, and nobody wants to threaten that.

As far as the wildlife numbers themselves, the Game and Fish contributed numbers on a 20-year historical basis for deer and 5-year historical base for elk and antelope. To do that, I think to consider what has happened in the past, what the carrying capacities are, what the effects would be, I think you have to have a standardization of numbers, make them accurate and not make them precluded to what the benefits may be.

It's been stated earlier that there's been impact on deeded land. I have a neighbor there. We have a lot of BLM land that we utilize. We have some deeded acres that we utilize. The more BLM that's used by wildlife, we get impacted directly. It affects us. We decrease our vegetation that's available to us, and that impact has to be considered when you make adjustments to wildlife. When you encourage wildlife, they are not controlled. Nobody manages them in a specific area. There is no plan that has been devised and that I know of has been put into effect that can correct and adjust to that. So when you're giving the impacts considering the effects that would have in making a change of designation, you had to consider that ripple effect that I would receive or any other person that would have something would receive.

I think to have a comprehensive plan you need

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accurate data. I think you need personnel that are familiar with the area. There are a lot of people that worked on this thing that are very well educated in a specific area and are very good at it, but we also need those people to get some benefit or can do a more effective job making decisions if they are familiar with the area. I think -- in closing, I'll just say we need to plan for the future, not for what happened yesterday or not what the needs and demands of the people were yesterday. We have to plan for tomorrow, what these people need, this country, everybody needs tomorrow. Thank you.

MR. LITTRELL: Are there any questions of Mr. Kourlis?

MR. POLFORD: Tom, you said the 20-year deer, 5-year elk, 5-year antelope, and then you made a point on that. What were you ...

MR. KOURLIS: The point that I was trying to make in trying to increase or establish the Game and Fish is giving you those numbers. If you take those numbers, that is the maximum, peak years that they are projecting. For example, in my area, the Axel Basin, they're saying that it is wildlife, critical wildlife to elk and antelope. There weren't any antelope, didn't exist in that country. My father homesteaded there in

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'28, was never an antelope there. They are now. When it comes to the elk, five years ago there weren't any elk in the Axel Basin. Now there are. So when they're projecting, giving you those numbers, they're saying there is a demand, there is a need because of a certain change that's happened, but that does not reflect the 20 years of the past or the 20 years that will come.

MR. LITTRELL: Any other questions? Thank you, Mr. Kourlis. Barry Smith.

MR. BARRY SMITH: My name's Barry Smith. I'm from Steamboat Springs, P. O. Box 2437, and I represent the kayakers in the Steamboat Springs area, hopefully, and myself. I am going to just address Cross Mountain here. I disagree with the redesignation of Cross Mountain. I think that it should be designated a wilderness area. Near the beginning of the talk some-one, of the meeting, someone spoke about taking away energy from his children, depriving the children of this energy if Cross Mountain was developed. Well, how about taking away this wonderful, unique canyon from our children? Soon there's not going to be anything around like that, and where are they going to go to see something the way it was?

Here you can travel through at any given time, see bald eagles, golden eagles as well as big horn sheep

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at one glance. I don't know of any other place that I could really do that except the Grand Canyon, and that's a whole different thing. Oil and gas can be found anywhere. Cross Mountain is unique and a natural wonder. In the future, if Cross Mountain is developed, it's gone forever.

The kayaking in this area is the finest in the country. In late summer on any given day you can see many groups of kayakers traversing and exploring the canyon, and they're amazed. Ever since the talk of Juniper on Cross Mountain I've tried to bring more and more friends down to see what a unique place this is, and they're just -- there's no other place in the country like it. There's no roads. There's no railroads. Almost any other trip around would have a road or a railroad track. We need more places like Cross Mountain, I think, for our own peace of mind in the future.

MR. LITTRELL: Is there any questions of Mr. Smith? Thank you. John Peroulus.

MR. JOHN PEROULUS: My name's John Peroulus, 1006 Ranney Street, Craig, Colorado. I represent John Peroulus and Sons Ranching. We have a book here that we've spent thousands and thousands -- I don't have any idea how much we've spent for this book. It's a management plan. It's going to have a lot of effect on what's

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going to happen in the future. When we started this plan we had the Little Snake River plan. The area manager had been here for several years, and just about the time we got started, there was a shift in personnel. We had a district manager that had been here for quite a while. We've had two district managers. We've had three area managers and a shift in the personnel all the way along while this plan was being devised. There's a lot of data in here that's just not right. It's because of the fact that people did not know, that contributed to this thing did not know the area. It's as simple as that.

We need to look to the future and have a good plan, but we don't have to have the wrong data in this thing, and this is what's happened here. There's data in here that's not right. It's going to have an impact on this area, which is primarily an energy and agricultural area, and when you take that you're going to make it hard for the people in this area to derive a living from this land, which is BLM land, which we contribute a lot of dollars to this area, the community. It's going to hurt. It's going to hurt bad because it's just simply -- there's no other way. The resources, the things that come off of this land is what makes this country. It's a new source -- the only thing, the land here is the only thing that actually produces any new wealth, and if we're

1 going to restrict it so we can't by having livestock  
2 grazing and farming and coal industry and gas and oil  
3 put down to where they can't make a dollar, why it's just  
4 going to have a devastating effect on the community.  
5 Thank you.

6 MR. LITTELL: Any questions of Mr. Peroulus  
7 from the panel? Thank you, Mr. Peroulus. Bill Agnew.

8 MR. BILL AGNEW: I'm Bill Agnew, 788 Riford Road,  
9 Craig, Colorado. I'm representing myself. First off I'd  
10 like to address the question concerning the appalling  
11 shape of the range resource of the BLM. The gentleman  
12 reflected that, and as a former range conservationist  
13 for the Soil Conservation Service here in Moffat County,  
14 I have had an opportunity to look at a lot of the range  
15 resource here in Moffat County, and much of that range  
16 resource was indeed on BLM land. First off, if you look  
17 at the information that the BLM provides, those data,  
18 many of those data were collected in the years 1978 and  
19 '79, and anybody that was familiar with the conditions of  
20 the situation as far as precipitation, five years in  
21 advance of that and up through that period, we were in a  
22 very dry cycle, a drought cycle, and those inventories  
23 indeed were conducted towards the latter part of that  
24 drought cycle. So much of the condition of those range  
25 is more a reflection of weather than they are of live-

1 stock utilization, I assume.

2 In 1983 I did have an opportunity, working on  
3 a conservation plan for a local rancher, I inventoried  
4 some of those same BLM lands that were in fair and poor  
5 condition, and my analysis, those same areas were in fair  
6 and excellent condition, and about twice to three times  
7 as much production on those same areas as their inven-  
8 tories had provided four years earlier. So the range  
9 resource I believe is in good, high, fair to good condi-  
10 tion, and the reflection that, the data that much the BLM  
11 uses is a reflection of inappropriate data, maybe timing  
12 of when they collected this data.

13 My primary question was the BLM's ability to  
14 maintain that multi-use concept with the RMP with  
15 the built-in inflexibilities of the plan. They say in  
16 there that the plan is very flexible, and I believe that  
17 with the present staff that the BLM has when a major  
18 conflict does arise, I believe that at the present time  
19 the conflict will probably be settled in a manner that is  
20 appealing to all involved; however, I think that the real  
21 threat of the RMP isn't three years down the road,  
22 it's ten years down the road when the staff of the BLM  
23 is changed again, and many people interpret the BLM's  
24 meaning per se for what the RMP says, and as I say,  
25 they verbally talk of flexibility within the plan.

1 However, there are built-in inflexibilities that will  
2 only arise 10 or 15 years down the road. Thank you.

3 MR. LITTELL: Is there any questions of Mr.  
4 Agnew? Thank you. Mick Harilla.

5 MR. MICK HARILLA: I'm name's Mick Harilla.  
6 My address is 280 Knoll Avenue in Craig. I'm a coal  
7 miner here in Craig, and I'm concerned -- one of my con-  
8 cerns is with the management of the coal leases. They're  
9 being made available now with, they're going to reflect  
10 the economic situation today. We're going to give away  
11 our coal at today's, for the price -- the price will be  
12 influenced by today's soft coal market. So, in other  
13 words, we're going to sell tomorrow's coal at today's  
14 lower price. That's my one concern.

15 My other concern is with the BLM's policy. I  
16 am pleased with much of the policy and planning that has  
17 come out of this, but I am concerned with the decisions  
18 of dropping certain wilderness considerations, and one  
19 of them happens to be the Cross Mountain area. I would  
20 like to submit a written comment on the Cross Mountain  
21 issue at a later date. That's all.

22 MR. LITTELL: Any questions of Mr. Harilla from  
23 the panel? Thank you. Wayne Sowards.

24 MR. WAYNE SOWARDS: My name is Wayne Sowards.  
25 I work for Trapper Mining, Inc. Trapper Mine's address

1 is Post Office Box 187, Craig, Colorado. We're located  
2 just south of the City of Craig. We operate a surface  
3 operation, conventional strip mine. We produce about  
4 2.3 million tons of coal each year, and we employed about  
5 225 people. We hold five separate federal coal leases  
6 and pay several millions of dollars each year in royalties,  
7 severance taxes, so forth.

8 I'd like to follow up on a comment Mr. Pearson  
9 had pointed out earlier that he believes the BLM has  
10 overemphasized the minerals to the extreme amount in this  
11 document. He was weighing pages. He counted 34, I  
12 think. I was weighing acres, and what I came up with is  
13 that over 80 percent of this management area is now  
14 precluded from coal leasing for surface mining activities.  
15 We've heard a lot of extolling of the wonderful wildlife  
16 and river resources we have here. I think I enjoy them  
17 as much as anybody. I happen to be a certified boatman.  
18 I enjoy white water rafting. However, this is also a  
19 unique area for oil and gas and minerals and needs to be  
20 given due consideration that that deserves as well.

21 I have several difficulties with the document  
22 as it's been developed. One of my major concerns with it  
23 is the management preferred area concept. The management  
24 preferred area concept assumes that we have incredibly  
25 accurate data. We draw very finite lines on a map, and



they indicate what a preferred management, what the preferred management should be within those particular blocks of property. It assumes that we know with a great deal of detail just exactly what's there on the ground. It also assumes that there's little or no variability within what are oftentimes huge blocks, oftentimes whole sections, more than one section together in one mapping unit, and what's curious is that oftentimes these mapping units follow township lines and section lines. The problem I have with it is that it sets its standard, particular type management for each particular area without knowing what specific projects might be proposed for that area. We're precluding coal mining in areas without knowing what kind of coal mining is being proposed for it and without knowing precisely on what ridge top or what valley that coal mine might be proposed to be located in.

The plan talks about some flexibility in the actual location of the lines on the ground and it talks about giving the nod towards the preferred management in cases where there's a conflict, but it doesn't talk about what amounts to a conflict, and I figure that in the future that the mere existence of another kind of land use will be considered a conflict. If a conflict is only a situation where there's significant compromise

in the preferred use, then that is one case, but if the designation of certain management units precludes, automatically precludes other kinds of land uses within that mapping unit, then I don't think the system is workable.

Lastly, I want to point out what I think is a concern with the designation of administrative quasi-wilderness areas. We have ACEC's, we've got RMA's, we have ONA's, we have wildlife areas, we have soil and water designated areas, wilderness areas and recreation areas. They all combine to form restrictions on mineral development in those areas.

Thank you. I will follow up with written comments.

MR. LITTRELL: Is there any questions of Mr. Sowards from the panel? Thank you. Mike Frazier.

MR. MIKE FRAZIER: I'm Mike Frazier, 917 Ledford Court, Craig, Colorado, representing myself. Forgive me if I ramble a little bit. I'm pretty tired. 8:30's my bedtime. I'd like to say that I think the wilderness values of Cross Mountain are really unique and extremely valuable. It seems like a very small parcel of land to get upset about by excluding it from oil and gas, mineral, livestock, and I don't think it does exclude livestock necessarily. I would like to see it protected from mining exploration. It's a very small

area, 1.3 million surface area, acres, and I just don't see such a big problem with such a tiny parcel of land being excluded from exploration.

I'm very much in favor of northwest Colorado being developed for oil and gas and minerals and livestock, but at the same time I think that there are unique recreational opportunities that exist here that can also be protected and should be. Cross Mountain is probably one of those areas. Juniper Canyon is also one of those areas in my opinion, and as far as damming these two canyons, I really wonder what the value of these dams would be. Is it to give the water to San Diego? They really need it. There aren't that many people there, and Mexico is just bulging at the seams with people, and they need to come across the border so they can enjoy our great lifestyle. Maybe we can give it to Denver. It's not very crowded yet. Or any of the eastern slope could really use the water that we could store here in Yampa because, I don't know, it's just, there isn't enough people to really make a, just to trade services, you know, to create jobs, and I think maybe someday Craig can, if we really throw away all of the restraints on development, maybe someday Craig can be as big as Denver or Philadelphia. I think we ought to bring them all out here. If we really work

at it, you know, if we get in enough conflicts with each other, fighting over little, bitty issues that don't amount to a hill of beans, maybe someday we can all make this place like Bombay, India.

Now, I'm for working together. You know, I like ranchers, I like their lifestyle. I appreciate what the energy can do for me, but I also appreciate solitude, being able to have a little elbow room and being able to see a deer and elk and not having to complain about it eating a little of my hay while I use public land at subsidized rates, and I don't mind subsidized rates. I think it's darned hard to make a living in agriculture in this country. I think they should be low, the rates that are charged to people who use the public land.

Mostly I guess I just want to say that, you know, I don't want to create any conflicts by what I say and believe, but I think we all need to work together, and we've got to save a little bit for everybody.

MR. LITTRELL: Does the panel have any questions of Mr. Frazier? Thank you. Tom Beachman.

MR. TOM BEACHMAN: My name's Tom Beachman. I live here in Craig. I came here as just a citizen of the county. I represent myself. I've been listening and learning here tonight, and really have a lot of questions in my own mind as to why there's so much

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1 resistance to the choices that have been selected for  
2 wilderness designation, and I even have some question as  
3 to why some of them were eliminated. I think we have to  
4 look at -- personally I think we have to look at this  
5 in proportion to what we have, what our resources are  
6 in this United States. We look at the State of Colorado.  
7 I feel like we've got to give the state, there's a lot  
8 of beauty here that has long-lasting value that's beyond  
9 being just renewable. It is a permanent -- it should be  
10 retained as a permanent jewel in this wonderful country  
11 that we have, and then when I look at Colorado in rela-  
12 tion to the rest, well, Moffat County in relation to  
13 Colorado, I see even a more rare entity besides it's a  
14 limited population. There's something quite beautiful  
15 about these areas that we've been talked about, and I  
16 can't understand why there's so much resistance to setting  
17 aside something as small as Cross Mountain.

18 I would invite any of you to go out there, and  
19 I cannot believe if anyone went to that canyon rim, stood  
20 on that canyon rim and looked over that thousand-foot  
21 drop would not think for a second what that would look  
22 like if they had dredging or the surface mining going on  
23 or the likes of a Hiawatha oil rig set up throughout  
24 that area, if all you could see were oil rigs or the  
25 strip mining going on. Why do we have to do it to Cross

B<sup>66</sup>

1 Mountain too? That's my only question.

2 MR. LITTRELL: Any questions of Mr. Beachman  
3 from the panel? Thank you. Conrad Zwanzig.

4 MR. CONRAD ZWANZIG: I'm Conrad Zwanzig, and  
5 my address is Box 2044, Steamboat Springs, and I live in  
6 south Routt County. Basically I'm up here to disagree  
7 with the BLM in their position on Cross Mountain, and my  
8 familiarity with Cross Mountain is based on several years  
9 of activity in that area, and last year I kayaked Cross  
10 Mountain 12 times, and while I was in there I was  
11 accompanied by approximately 60 other individuals  
12 counting all of my visits in 1985. This year I've been  
13 there twice already. The first time the river was frozen  
14 over so I hiked around for a day instead of kayaking,  
15 and then last Friday, March 7th, I kayaked and hiked  
16 the entire canyon on the same day. While I was in there  
17 I saw six eagles, five big horn sheep who were grazing  
18 almost at river level, and a herd of antelope and several  
19 mule deer. I don't fish so I couldn't say anything  
20 about what's in the water.

21 Now, the BLM rationale for not including Cross  
22 Mountain in the wilderness preservation system is based  
23 on two main points according to their summary. The  
24 first point is the desire for multiple resource management  
25 and the second is the representation of the vegetation,

B<sup>67</sup>

1 ecology and topography supposedly elsewhere. The first  
2 point, well, I'd have to say that there are no proven  
3 oil and gas resources, just dry holes, and as far as  
4 the second point goes, limestone mining claims could be  
5 easily excluded from the designated area as they are  
6 small, 200 acres. They're on the boundary.

7 Now, if I return to the second rationale that  
8 there's adequate representation of the vegetation,  
9 ecology, topography elsewhere, BLM's own summary states  
10 that the canyon has sheer vertical walls and geologic  
11 interest. These thousand-foot walls and unique geology  
12 cannot be found in other designated BLM wilderness areas.  
13 The eco system which includes the wildlife previously  
14 mentioned and the river bottom too is not well repre-  
15 sented elsewhere in such close proximity. I mean you  
16 can find elk here, sheep there, fish here, but when you  
17 put them all in one little place, it doesn't happen  
18 very often. Now, this place is not designated as  
19 wilderness. Administrative protection would be subject  
20 to radical and quick changes in personnel and policy.  
21 On the other hand, legislative protection would require  
22 that there be careful thought before changes were made  
23 in the management of this area. That's all I'm asking  
24 for is careful thought.

25 And for those people out there who haven't,

B<sup>68</sup>

1 well, quite read through the whole statement, designa-  
2 tion does not preclude water development or dam sites.  
3 That's a separate issue. That has nothing to do with  
4 designations of wilderness. It is not included.

5 In conclusion, I'd like to ask the BLM to re-  
6 assess its own comments which point up the benefits of  
7 wilderness designation, and to give less weight to un-  
8 proven values such as oil and gas. I endorse the  
9 conflict resolution alternative which they have drawn  
10 up which addresses the proven limestone resource, and I  
11 urge the BLM to abandon its nonsuitable-for-wilderness  
12 position. Thank you.

13 MR. LITTRELL: Is there any questions from the  
14 panel for Conrad? Thank you. John Raftopoulos.

15 MR. RAFTOPOULOS: I'm John Raftopoulos. I'm  
16 representing Raftopoulos' Ranches. There's three  
17 issues I'd like to address. The first one was  
18 addressed by Dean Visintainer also, but the areas north  
19 of Craig, which is an area of BLM that includes lots of  
20 private land, has designated as more or less a wildlife  
21 wintering area. Just to be precluded from mineral  
22 development, I don't think that the BLM should be  
23 setting policy on private land. Since that area includes  
24 quite a bit of deeded land, I don't think that it's fair  
25 that BLM designate policy on the deeded land, which they

B-29 1 inadvertently are doing by setting that designation.

2 Secondly, I think they're overly stressing the  
3 recreational economic effects of BLM lands in the area  
4 when skiing takes about half of the 130 or -40 million  
5 dollars that they, the 130 or -40 thousand that they  
B-30 6 say the economic benefits are, the recreational benefits  
7 when it includes the Steamboat Springs area. I don't  
8 think the effects are, when you deduct that ski area  
9 income, that the effects are that large. I think it's  
10 overemphasized, and also I'd like to reiterate Bill  
11 Agnew's point about 50 percent of the range being in  
B-31 12 poor or unsuitable condition. I think that needs to  
13 be reevaluated since we did have those dry years.  
14

15 MR. LITTRELL: Is there any questions of John?  
16 Thanks a million. John Worthington.  
17

18 MR. JOHN WORTHINGTON: John Worthington, Box  
19 116, Maybell, and I'm representing myself and our  
20 business, which is a livestock operation which is west  
21 of Maybell. I would like to address two issues here  
22 tonight. One is the designation of Cross Mountain as  
23 a wilderness area and also the R  
24

25 First of all, Cross Mountain is a unique area,  
26 and we wish very much to have it remain so, and under  
B-32 27 the multiple use concept or plan, it has remained an  
28 area in which everybody can go and visit the wildlife.

B-32

1 They can leave their ideas and a future ideas for the  
2 children and, you know, when you have a unique area like  
3 this, why designate it as a wilderness area which may  
4 transpose it into something entirely different than  
5 what Cross Mountain is at the present time? Now, we  
6 talk about overgrazing of livestock or the other  
7 problems that might defer the use of Cross Mountain,  
8 but, gentlemen, it's remained a unique area under the  
9 multi-use concept, and I feel it should remain as the  
10 multi-use concept. Now, if we have deeded land along  
11 one side of it, and I think the deeded land has to  
12 stand the majority of the wildlife that is brought into  
13 the area by the wilderness area.  
14

15 I'd like to also address the resource manage-  
16 ment plan. This is a book of many specifics. Many  
17 of them are not proven for our area. The preferred  
18 alternative is an alternative that has been pushed or  
19 preferred with not knowing what concept or what effect  
20 it will have on the BLM management in the future.  
21 And under the multi-use concept, we've been going along,  
22 and we've been able to survive. We've built up an  
23 area in northwestern Colorado that is used by many  
24 different interests, both recreationists, livestock  
25 interests, energy development and so on, and it is  
26 being protected. It's not going to be destroyed. Why  
27  
28

1 not go under the same plan that we've been operating  
2 under, and let's make some improvements with it and not  
3 preclude the idea that livestock in every instance is  
4 the main culprit in destroying the habitat of the BLM  
5 lands. We also have to realize that the wildlife has  
6 increased at least 50 percent in our area in the past  
7 few years, and they have led to many problems in over-  
8 grazing. We certainly need wildlife, but we certainly  
9 need a balance or multi-use concept in government lands,  
10 and we must remember the people that pay the bill on  
11 those lands. Thank you.  
12

13 MR. LITTRELL: Any questions of Mr. Worthing-  
14 ton on the panel? Thank you, Mr. Worthington. Gary  
15 Tubman.  
16

17 MR. GARY TUBMAN: My name is Gary Tubman. I  
18 reside in Craig, 945 Alta Vista Drive, and I represent  
19 myself. I'm a local dentist here, and I have to say I  
20 interface with a good number of people every week, and  
21 I talk to these people. We don't just talk about work.  
22 That gets old. And I'd like to address the fact that  
23 a lot of these people are in northwest Colorado not just  
24 because of their work, to be coal miners, ranchers, etc.  
25 but they're here to enjoy the environment.  
26

27 I'd just like to make some general comments  
28 about the global ecology and how northwest Colorado is

B-33

1 part of that global ecology. I don't know if people  
2 here are familiar with a series called Nova aired by the  
3 PBS system, Public Broadcasting System. They talked  
4 about what we're doing to the earth, what's happening  
5 to the lions in Africa, the rain forests, etc. I agree  
6 we have to reach a balance. I agree with the ranchers.  
7 I agree with oil and gas, but I think a balance needs  
8 to be reached here. You take Cross Mountain and not  
9 utilize that for recreation or rape entire area, what  
10 is left? I feel that we have to look at the balance  
11 of nature.  
12

13 Let me give one specific example. The Craig  
14 Economic Development Committee is trying to attract  
15 businesses to this area, and part of the platform is  
16 recreation. I'm just saying that recreation needs to  
17 be a part of northwest Colorado. Specifically, I would  
18 like to see Cross Mountain area preserved as a wilder-  
19 ness area. That's all I have to say. Any questions?  
20 Thank you.  
21

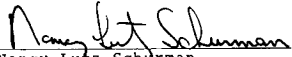
22 MR. LITTRELL: Thank you, Mr. Tubman. Are  
23 there any more statements that anybody would like to  
24 make this evening? Anybody that felt like they didn't  
25 have enough time, that they would like to get up and  
26 continue on for a little bit?  
27

28 Okay, in that case then this hearing is now

1 adjourned. I want to thank everybody for taking your  
2 time and providing BLM with this information. As I  
3 stated earlier, there will be BLM personnel throughout  
4 the room to answer questions. I would like to ask now,  
5 Bill, do you have anything that you would like to say?  
6 Thanks again for coming out.  
7  
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17 REPORTER'S CERTIFICATE

18 I, Nancy Lutz Schurman, Court Reporter and Notary  
19 Public, State of Colorado, do hereby certify that the  
20 foregoing pages 2 through 73, inclusive, constitute  
a true and accurate transcription of the meeting held  
at Craig, Colorado, on March 12, 1986.

21  
22   
23 Nancy Lutz Schurman  
24 P. O. Box 4512  
25 Steamboat Springs, CO 80477  
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U.S. DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
CRAIG, COLORADO DISTRICT  
LITTLE SNAKE RESOURCE AREA

REPORTER'S TRANSCRIPT

PUBLIC HEARING

ON

LITTLE SNAKE

RESOURCE MANAGEMENT PLAN

ENVIRONMENTAL IMPACT STATEMENT

AND WILDERNESS TECHNICAL SUPPLEMENT

PURSUANT TO NOTICE, the above-entitled

Public Hearing was held at the Bureau of Land  
Management, Vernal District Office, 170 South 500  
East Street, Vernal, Utah, on Thursday evening,  
March 13, 1986, commencing at 7:15 p.m. Mr. Forest  
W. Littrell of the Bureau of Land Management, Area  
Manager for the Grand Junction, Colorado Resource  
Area, presiding. The Hearing Panel was composed of  
Mr. Larry Bauer, Mr. Duane Johnson, Mr. Glenn  
Sekavec and Mr. Greg Goodenow.

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I N D E X

SPEAKER:

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Mr. Ron Trogstad . . . . .	3
Mr. Forest W. Littrell . . . . .	5
Mr. Duane Johnson . . . . .	7
Mr. Greg Goodenow . . . . .	10
Mr. Neal Domgaard . . . . .	19
Mr. Mike Goddard . . . . .	20
Mr. Will Durant . . . . .	21
Mr. Dave Kennell . . . . .	27
Mr. Stephen Borton . . . . .	28

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excellent idea.

I'm a little disappointed that the Cross  
Mountain has been pulled off of the wilderness and  
is recommended for more of a management instead of a  
wilderness proposal. I think that the loss there of  
the canyon, and the big horn sheep, and not to  
mention the endangerment of the area, is overlooked,  
even though you did recognize it in your draft. And  
I would like to propose to the BLM to look at this  
again because I think that section is a great loss,  
and I think that for the minuscule amount of land we  
are talking about down in the canyon, that there  
would be a great deal of benefit for all of the  
folks that live in the area.

Thank you.

MR. FOREST LITTRELL: Thank you,  
Mike.

Will Durant. Did I get that correct?

MR. WILL DURANT: It's Durant.

MR. FOREST LITTRELL: Durant.

MR. WILL DURANT: Yes.

MR. FOREST LITTRELL: Would you come  
forward and give your testimony, please?

MR. WILL DURANT: I have submitted a  
written statement to the panel here. I have written

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a statement to Mr. William J. Pulford, Craig  
District Manager, Bureau of Land Management, Craig,  
Colorado.

Dear Mr. Pulford:

The one hundred-member Uintah Mountain  
Club would like to go on record supporting the  
concept of wilderness designation for the areas  
adjacent to Dinosaur National Monument which have  
been delineated by the term Wilderness Study Area in  
the Draft Resource Management Plan for the Little  
Snake Resource Area. I think it's important that I  
said the word "concept" at this point, and I will  
make that more clear later on. Although we have not  
reached a consensus on the extent and composition of  
the areas which should be included in the National  
Wilderness Preservation System, we feel that, in  
general, these areas possess the requisite  
characteristics that make them equally suitable to  
join the many wonderful lands which have already  
received the designation of wilderness.

We must emphasize that determination of  
whether an area is suitable for wilderness  
designation should not be based on above or below  
ground mineral characteristics or economic value to  
the ranching, farming or industrial communities.

1 Suitability -- suitability -- has nothing to do with  
 2 the economic value of the land to human users.  
 3 Suitability is a quality judgment, and should be  
 4 based upon the inherent natural values of the land.  
 5 Thus, an area should not be disqualified as suitable  
 6 because of economic plans or mineral worth. It is  
 7 important to make this distinction. An area must be  
 8 declared suitable for wilderness designation if it  
 9 meets the criteria for wilderness according to the  
 10 guidelines set forth in the National Wilderness  
 11 Preservation Act and other legislation pertaining to  
 12 unroaded areas extant in the Federal Lands Policy  
 13 and Management Act of 1976. Only Congress, not the  
 14 Bureau, can determine whether a candidate area  
 15 should be designated as wilderness, and this  
 16 decision can, indeed, be made on the basis of  
 17 economic value judgments. Only Congress should  
 18 decide whether the economic values of the land  
 19 outweigh the natural values of the land. If this  
 20 distinction is not made by the Bureau of Land  
 21 Management, then a serious flaw exists in the  
 22 evaluative process. Often, legislative decisions  
 23 are made on the basis of Bureau recommendations  
 24 alone. Uninterested legislators from other areas  
 25 may then participate in an action in an automatic

1 and less than critical fashion. Legislative action  
 2 may proceed without all the information necessary to  
 3 ensure that the long-term interests of the public  
 4 are adequately represented.  
 5  
 6 There is evidence that the evaluation  
 7 process may be flawed when potential economic values  
 8 disqualify areas such as Cross Mountain astride the  
 9 Yampa River. I repeat, the appropriateness of  
 10 wilderness designation is a legislative decision.  
 11 Suitability stands alone.  
 12  
 13 We are pleased but not overly encouraged  
 14 that the Diamond Breaks Wilderness Study Area was  
 15 recommended, but one is led to the conclusion that  
 16 this area was declared suitable only because no  
 17 economic value could be attached to the area. This  
 18 is not a reason to recommend that an area be  
 19 designated wilderness.  
 20  
 21 We very much applaud the decision to  
 22 designate Irish Canyon as an "Area of Critical  
 23 Environmental Concern." We feel this should give  
 24 adequate protection to a very special area.  
 25  
 26 We support the inclusion of Little Yampa  
 27 Canyon in the Wild and Scenic Rivers System, and we  
 28 are disturbed that the BLM refused to consider wild  
 29 and scenic status for this section of the river in

1 their Resource Management Plan. We feel certain  
 2 that this decision in large measure reflects the  
 3 anachronistic idea that yet another dam may be  
 4 needed on a wild western river. The era of dam  
 5 building has come and gone. In a time of concern  
 6 for the federal deficit and burgeoning government  
 7 expenses, we can no longer expect the federal  
 8 government to fund large public works projects for  
 9 the benefit of the private sector. Typically, these  
 10 projects involve a poor cost/benefit profile, and  
 11 frequently destroy areas of outstanding riparian,  
 12 aesthetic and recreational value. We feel that an  
 13 undammed Yampa River deserves more consideration and  
 14 protection than it has thus far received.  
 15  
 16 Further written comments and  
 17 recommendations will be submitted by individuals and  
 18 by the Uintah Mountain Club prior to the May 9th  
 19 deadline.  
 20  
 21 To give you an example of the distinction  
 22 I'm talking about, in Louisiana, my Granduncle Otis  
 23 had a 40-acre patch, and my granddaddy came up one  
 24 day and asked him why he hadn't put in soybeans on  
 25 the 40-acre patch. He said, "That's a real fine  
 soybean patch you got there."  
 He said, "Well, no, it's not. I'm going

1 to drill for oil on that patch." He said, "No,  
 2 that's not a fine soybean patch, I'm going to drill  
 3 for oil on it."  
 4  
 5 After he got through drilling a dry hole  
 6 on the soybean patch, my granddaddy came up to him  
 7 and said, "You are right, that's not a very good  
 8 soybean patch."  
 9  
 10 And that's, essentially, what we are  
 11 talking about, we are making this distinction.  
 12  
 13 Suitability, whether or not an area is  
 14 suitable for wilderness is based on the  
 15 characteristics of that particular piece of land.  
 16 If it is suitable for wilderness, it is suitable for  
 17 wilderness. Now, it may very well have economic  
 18 values that preclude it being designated by Congress  
 19 for wilderness, but that's a value judgment that has  
 20 to be made by our elected representatives. That's  
 21 the distinction I'm making here.  
 22  
 23 It seems that the Wilderness Study Areas  
 24 were excluded because there were other values which  
 25 the Bureau felt were greater. That is, I think, a  
 distinction that needs to be made by our elected  
 representatives.  
 My name is Will Durant, 3264 West 500  
 South, Vernal, Utah, and I'm representing the Uintah

Mountain Club.

MR. FOREST LITTRELL: Thank you, Mr. Durant.

Dave Kennell.

MR. DAVE KENNEL: It's Kennell.

MR. FOREST LITTRELL: Kennell. Sorry about that, Dave.

MR. DAVE KENNEL: Two out of four.

My name is Dave Kennell, my address is 242 South 100 East, Vernal, Utah. I'm here representing myself.

I would like to say, I agree in part with almost every speaker here tonight.

To start off with, I agree with Neal Donggaard, who said, "I do also believe in multiple-use management, but to manage for multiple-uses." And as part of that resource I include primitive recreation opportunities in the wilderness areas. And I think, as an agency responsible for managing a multi-use management program, the BLM needs to allocate resources that provides those opportunities. And I commend the BLM for recommending the Diamond Breaks WSA in their wilderness proposal, I think that is a very good recommendation.

I would like to state that I believe that the BLM should continue to manage not only the three areas, the Diamond Breaks, West Cold Spring and Cross Mountain wilderness areas as Wilderness Study Areas as a wilderness area until Congress decides, you know, how this land should be allocated and, in addition to that, I think the additional areas, Ant Hills, Chew Winter, Peterson Draw, and Teepee Draw, should also be, you know, managed as roadless primitive areas until Congress decides, you know, what these lands should be allocated as.

I'm thankful for the maps up here, I think they are really good. I would recommend that you put what the BLM alternatives are on these maps, if you have any other future public meetings, just to provide some clarity to the people that are attending the meetings.

MR. FOREST LITTRELL: Thank you, Dave.

Stephen Burton.

MR. STEPHEN BORTON: I'm Stephen Borton.

MR. FOREST LITTRELL: That's an O instead of a U. Sorry about that.

MR. STEPHEN BORTON: That's all

right.

644 East 3050 South, Vernal, and I'm representing myself.

I guess I'm here because I have been a longtime supporter of Dinosaur National Monument. And I always felt like the border was artificial when it was laid out, in too many spots it stayed too close to the rivers, and I felt the wilderness areas would remedy some of that situation; they don't go as far as I would like. I realize other people have use for the land and I'm willing to give them their say, too.

I'm also concerned about the big horn sheep habitat, and for that reason I'm concerned about what is going to happen with the Cross Mountain area. It's one of the few areas I have been able to personally explore a little bit. I would like to see that included in as wilderness.

And I guess the last reason I'm here is I too often hear that nobody in Vernal cares about wilderness, cares about wild land, at least that's what I hear in the news. But I do find lots of people that do care and do want to hand something down to their children other than just oil rigs and oil wells.

Thank you.

MR. FOREST LITTRELL: Thank you, Stephen.

Is there anyone else in the group this evening that would like to testify?

In that case, then, if there's no other one that wants to testify, this hearing is now adjourned.

I want to thank you for taking your time to provide the Bureau of Land Management with this information. As I stated earlier, there will be BLM personnel throughout the room to answer any questions that you would like to discuss with them this evening.

And with that, the hearing is closed.

I would like to ask, Larry, do you have anything that you would like to say?

MR. LARRY BAUER: No.

MR. FOREST LITTRELL: Okay. Therefore, the hearing is closed. Thank you very much for coming up.

(The hearing concluded at 7:46 p.m.)

## C E R T I F I C A T E

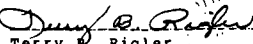
STATE OF COLORADO )  
COUNTY OF MESA ) SS:

I, Terry B. Rigler, Notary Public and  
Certified Shorthand Reporter, State of Colorado, do  
hereby certify the facts as stated by me in the  
caption hereto are true; that the foregoing is a  
true and accurate transcript of my stenotype notes  
then and there taken.

I further certify that I am not employed  
by, related to nor of counsel for any of the parties  
herein nor otherwise interested in the outcome of  
this action.

In witness whereof, I have affixed my  
signature and seal this 17th day of March, 1986.

My commission  
expires: 9/17/88

  
Terry B. Rigler  
2004 North 12th Street  
Grand Junction, CO 81501  
(303) 241-5664

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Mr. Roy S. Johnson

Batt.

County Clerk

Donna M. Johnson

It is hereby recommended that the Little Snake  
District be placed in the Supplemental

and should be placed in the Supplemental  
and should be placed in the Supplemental

and should be placed in the Supplemental

County Clerk

Donna M. Johnson

Batt. County Clerk

Donna M. Johnson

Donna M. Johnson

William J. Pulford  
District Manager  
Craig District  
Bureau of Land Management  
455 Emerson St.  
Craig, CO 81625

February 15, 1986

Dear Mr. Pulford,

I would like to comment on the draft Resource Management  
Plan for the Little Snake Resource Area. My major concern  
with the plan is that the Cross Mountain WSA was not  
recommended for wilderness designation.

I used to live in Elk Springs, Colorado, and have visited  
Cross Mountain many times. I find it to be one of the  
most impressive natural areas in the state of Colorado.  
Cross Mountain is well deserving of wilderness designation,  
and I recommend that you reevaluate your decision. Thank  
you for allowing me to comment on the plan.

Sincerely yours,

David Simpson

David Simpson  
544 328 Rd.  
Clifton, CO 81520

3

3

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson St.  
Craig, CO 81625

February 20, 1986

Dear Mr. Pulford

After reviewing the proposed management plan for the  
Little Snake Resource Area, I would like to make a few  
comments.

Coal Development

3-1 Coal should not be leased in recreation and wildlife  
priority areas, since even underground mining can  
cause subsidence of surface terrain and have impacts  
on the desirability of an area for recreation or  
wildlife purposes. In particular, the lies Mountain  
Coal Tract should not be leased in the Little Yampa  
Canyon recreation area.

Oil and Gas Development

3-2 I would be opposed to the Avoidance Stipulations for  
oil and gas leasing in ACECs and RNAs. The biological  
and geological resources in these areas are important  
and rare. Oil and gas development has substantial  
adverse impacts on the surrounding natural environment,  
and should not be permitted in these important natural  
areas. I recommend No Surface Occupancy stipulations  
be placed on all ACECs, SHRAs, RNAs and the Cold Springs  
Mountain Wildlife and Recreation area where oil and  
gas reserves are economically accessible with directional  
drilling. Since it has been determined to be illegal to  
lease "No Surface Occupancy" in an area that is not  
economically accessible by directional drilling,  
3-3 mineral withdrawals need to be put in place for all  
remaining sections of the above mentioned areas. For  
locations with slopes over 35%, No Surface occupancy  
should be put into effect, because of the high  
potential for erosion. Roads for oil and gas production  
should be considered temporary rather than permanent  
roads as the plan states on page 2-65. No Surface  
occupancy stipulations should be considered a must for  
areas within 1 mile of a water source rather than an  
option. The Plan must state that Environmental Impact  
Statements will be completed before leasing because of  
the court decision of *Donners vs. Burford*. It would  
be extremely helpful if you included maps with the  
3-4 leases delineated and when each lease comes up for  
renewal for both oil and gas as well as coal.

Pulford Letter - Page 2

Grazing

3-5 The use of fences in recreation and wildlife priority  
areas ought to be minimized. Livestock distribution  
should be controlled in these areas instead (when possible)  
with water tanks and salting.

Forestry

3-6 Timber production should only occur when it can be  
profitable to the Bureau of Land Management. I am  
opposed to subsidies for timber production and this  
includes road construction subsidies for timber  
harvest. The two high priority Access Needed areas  
on Douglas Mountain should be eliminated for this  
reason.

Wilderness

3-7 Although all WSAs in the Little Snake Resource Area  
would make good wilderness areas, the WSAs that would  
be the best additions to the national wilderness  
Preserve System are Cross Mountain and Diamond Breaks.  
I would like to commend the Bureau of Land Management  
on the recommendation of Diamond Breaks, but Cross  
Mountain should also be recommended for wilderness  
designation. Cross Mountain is a spectacular area.  
I have hiked through the canyon and over the north  
part of the mountain. I find Cross Mountain to be  
one of the most outstanding potential wilderness  
areas in the state.

Proposed Natural Areas

3-8 All the proposed Natural Areas proposed in the Natural  
Environment Alternative should be protected in the  
Preferred Alternative. These seven areas total only  
2,935 acres and would protect some very outstanding  
biological and geological resources. I feel that the  
Bureau of Land Management has ignored its responsibility  
to protect these very unique areas. All RNAs should  
have No Surface Occupancy stipulations and be closed  
to motorized vehicles.

Areas of Critical Environmental Concern

3-9 Hell's Canyon is deserving of ACEC status because of its  
unusual plant life. The Bureau of Land Management also  
work in selecting Irish Canyon, Lookout Mountain,  
and Cross Mountain Canyon as ACECs, but should also add  
Hell's Canyon to this list. In order to give the best  
protection possible to these outstanding areas No Surface  
occupancy stipulations or mineral withdrawals should  
be implemented and motorized vehicles should be limited  
to existing roads. The existing roads should be evaluated  
to see if they are truly necessary; if not they need to  
be eliminated.

Pulford Letter - Page 3

- 3-10 Recreation  
The Cold Springs Mountain recreation area should include all lands which are in the West Cold Springs WSA. I would like to see what the Bureau of Land Management considers to be existing roads mapped out in the final management plan for the Cold Springs Mountain area and the Fragile Soil and Watershed areas. I would also like to see mapped out what would be the designated roads and trails for motorized use in Irish Canyon, Lookout Mountain, Little Yampa Canyon, Cedar Mountain and Cross Mountain. The upper Little Yampa Canyon recreation priority area should be expanded north to include the excluded sections of the Yampa River. Calico Draw ought to be excluded from the list of areas needing recreation access because the paleontological importance of the area will probably be adversely effected by the increase in recreational use.

- 3-11 Wild and Scenic Rivers  
The Yampa River from the Little Snake River to the Williams Fork has been identified by the National Park Service as a National Inventory River. Under regulations to all federal agencies (Federal Register 9-5-80) the Bureau of Land Management is required to examine how the management plan will affect the National Inventory River section of the Yampa. The management plan should also make recommendations on wild and scenic status suitability on the Yampa.

- 3-12 Right of ways  
All ACECA wilderness areas, RNAs as well as recreation and wildlife priority areas should be considered unsuitable for Right-of-way corridors, because of the inherent conflict between these uses and Right-of-way corridors' impacts. For this same reason future communication facilities should be banned from Cedar Mountain.

- 3-13 Lands  
Although lands around Elk Mountain and Blacktail Mountain are recommended for land retention and acquisition, no management guidelines are set for the areas. I recommend that the Blacktail Mountain retention area's southern boundary be made the T.3N. and 7.4N. township boundary in order to better protect the Yampa River and the scenic vistas from the National Forest Service's Service Creek W.S.A.

#### Advisory Council On Historic Preservation

The Old Post Office Building  
1000 Pennsylvania Avenue, N.W. #809  
Washington, D.C. 20004

Reply to: 730 S. Main Street, Room 450  
Golden, Colorado 80401

February 24, 1986

Mr. William J. Pulford  
District Manager  
Craig District Office  
Bureau of Land Management  
455 Emerson Street  
Craig, Colorado 81625

RE: Draft Little Snake Resource Management Plan (Plan) and  
Environmental Impact Statement (EIS)

Dear Mr. Pulford:

On February 3, 1986, the Council received the referenced document. We have reviewed the Plan and find it to be generally thorough and well reasoned. The Plan indicates that exploration and development of oil and gas resources and designation of open off-road vehicle areas may impose potential adverse effects on historic properties. It should also be recognized that recreational use of the planning area may cause effects on cultural resources, as well.

We are pleased to learn that an overall cultural resource management plan is to be developed, and hope that this plan will address these issues effectively. We encourage you to initiate consultations with the Colorado State Historic Preservation Officer and the Council, pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations, at an early date in order to avoid any confusion or delay in developing and implementing the Plan.

If you have any questions or if we can provide anything further at this time, please contact Dean Shinn at (303) 236-2682 or at 573-776-2682.

Sincerely,

Mayme Ingle

for Robert Pink  
Chief, Western Division  
of Project Review

Pulford Letter - Page 4

Thank you for allowing me to comment on the plan. I hope that you examine my comments closely.

Sincerely yours,

Kirk Koepsel  
Kirk Koepsel  
11608 S. Apache Tr.  
Conifer, CO 80433

William J. Pulford, Craig District Manager  
Bureau of Land Management  
455 Emerson St.  
Craig, Co 81625

Dear Mr. Pulford:

I am writing to protest the BLM recommendation  
against wilderness designation of Cross Mountain

From an ecological standpoint, Cross Mt. provides  
a crucial habitat for many threatened and  
endangered species. It is home to bald and  
golden eagles, peregrine falcons, humpback chub,  
Colorado sparrowfish and razorback suckers.

5-1 Besides big game animals like antelope, mule  
deer, and elk. It is the epitome of  
wilderness and a recreational area unsurpassed.

While on geology field camp with the  
University of Michigan many years ago, I

5

first visited this area and studied the geology. Although I am a geologist, I feel the importance of this wilderness far outweighs industrial needs.

Sincerely,

R.P. Bloodworth

6

120 Dextera Street  
Denver, Colorado 80202  
March 2, 1986

William J. Pulsford  
Craig District Manager  
BLM  
455 Emerson St  
Craig, Colorado

Dear Mr. Pulsford:

Please reconsider the BLM's recommendation that Cross Mountain should not be a wilderness area. The stunning gorge ~~area~~ deserves to be left in its primitive state. It seems unreasonable in the present oil & gas excess climate that such a special area would be developed.

I love the Yampa & Green Rivers. They hold special places in my heart. Since I have run the river in my whitewater dory & hiked in the areas surrounding the areas. The Cross Mountain Gorge is obviously unmanageable in a dory, but at low water I was able to walk in the gorge. Please don't lose this area.

Sincerely,

Stennis Gade, MD  
(GADE)

7

March 3, 1986

Mr. William Pulsford  
Craig District Manager  
Bureau of Land Management  
455 Emerson St  
Craig, CO 81625

Dear Sir:

Thank you for having recommended Diamond Breaks and Irish Canyon as suitable areas for wilderness designation and for the protection of the rare plant varieties located there.

I would also like to say that I am opposed to designating grazing areas on land that your department manages. I am disgusted as the BLM's refusal to designate Cross Mountain as a wilderness area. Why must your department keep favoring large industry at the destruction of the few natural areas of life that we have left?

Sincerely,

Joyce Fishburne  
2198 N. Alpine  
Parsons, CO 80134

8

Mr. William J. Pulsford, Craig District Manager  
Bureau of Land Management  
455 Emerson St  
Craig, CO 81625

Dear Sir:

I am surprised & very disappointed by the recent action by the BLM in rejecting wilderness designation for the Cross Mountain Wilderness Area.

My father ~~was~~ lifelong conservationist up to the environment looking for old wilderness as so many other people do. He recent economic & political events have dropped the price of old so that is now worth a fraction of what it once was. He's started Colorado against further waste like this under the threat of "progress".

Please designate Cross Mountain as a wilderness area. We need it.

Sincerely, Paul Pulsford

P.S. Please include this letter as a part of the public hearing on 3/10/86 at the BLM.

March 3, 1986

Mr. William J. Pulford, Craig District Manager  
Bureau of Land Management  
455 Emerson St.  
Craig CO 81625

I wish to oppose the BLM's refusal to grant wilderness designation for the Cross Mountain area.

9-1 This is a crucial habitat for many threatened and endangered species, and contains some of the most stunning and ecologically diverse country in Colorado. I trust the Bureau of Land Management will reverse its decision, and grant this irreplaceable area wilderness designation.

Sincerely,

*Lorraine Lane*  
Mrs. Lorraine Lane  
3505 W. 39th Ave  
Denver CO 80211

FORT LEWIS COLLEGE  
DURANGO, COLORADO

5 March 1986

William J. Pulford,  
Craig District Manager,  
Bureau of Land Management,  
455 Emerson Street,  
Craig, Colorado 81625

Dear Sir:

This is to register my concern for the recent decision against wilderness designation of Cross Mountain Wilderness Study Area, an anciently a Bureau of Land Management decision in favour of development rather than the preservation of a unique and unspoiled area.

My familiarity with this area dates back to the early 1950's during my tenure as Professor of Botany at the University of Wyoming; my interest has continued over the years as I served as the President of Fort Lewis College (now retired) and as a resident of Colorado.

10-1 I know that the whole area surrounding the Simpson National Monument is one of the Nation's unique features whose value as a wilderness area far surpasses any short-term values that seem to have motivated the Bureau's failing to consider the Cross Mountain Wilderness Study Area worthy of preservation.

Before it is too late, please register my protest of this decision at any and all levels of decision-making within the Bureau of Land Management. The effects of this decision can be catastrophic to a bit of America well worth saving!

Thank you.

Sincerely,

*John R. Reed*  
John R. Reed

C. M. K. Shulley  
Craig, CO 81625

4474CR 225  
Durango, CO 81302,  
March 4, 1986

William Pulford,  
Craig District Manager  
BLM  
455 Emerson St.  
Craig, Colo 81625

Dear Mr. Pulford,

11-1 I am writing to you to urge you to reconsider wilderness designation for Cross Mtn Wilderness. This land is much too beautiful & ecologically important to be ravaged by oil & gas development. Use the other 1,878,000 acres of federal oil & gas acreage in the area & leave Cross Mtn unspoiled. We need this wilderness land.

Sincerely,

*Dusty Wright-Hadfield*  
Dusty Wright-Hadfield

P.O. Box 511  
Durango, CO 81302  
March 6, 1985

Dear Mr. Pulford:

12-1 I am appalled that Cross Mountain Wilderness Study Area was not recommended for wilderness status. I have visited Cross Mountain twice, and strongly believe it should be protected as wilderness. The destruction of the area is not worth what little oil and gas might be found there. Please change your recommendation to that of wilderness status. Thank you.

Sincerely,  
Steven M. Bortz

13

JOHN SPEZIA  
BOX 2255  
STEAMBOAT SPRINGS  
COLORADO, 80417

MARCH 5, 1986

BLM,

I am absolutely stunned as a result of reading your BLM wilderness recommendations! I could go on for pages describing all the wilderness qualities of Cross Mtn, Cold Springs and 5 other areas adjacent to Dinosaur National Monument. But, I'm sure you have heard them before by many people.

What is more incredible is your reasons for not recommending these areas.

All the wells drilled around Cross Mtn. are dry, so how does one come to the conclusion that there is a "high potential"?

The amount of oil & gas, if it exists in all wilderness areas in Colorado may amount to 1 or 2%... the 14,000 acres in Cross Mtn compared to almost 2 million acres in federal oil & gas is totally insignificant!

Recreational Management is a farce!! It does not give any protection because the BLM can change it at any time.

Your recommendations are POOR! Please change them to Wilderness Status. Sincerely,  
John Spezia

March 5, 1985 14

CRAIG DISTRICT MANAGER  
BUREAU OF LAND MANAGEMENT  
CRAIG, COLORADO

Richard A. Quirk  
1201 18th Street  
Steamboat Springs, Colorado 80417

ATTN: MR. WILLIAM J. PULFORD

Dear Sir:

As a resident of Northwest Colorado, I am very displeased to learn of the BLM decision to recommend against wilderness designation for the Cross Mountain WMA.

With the unparalleled vistas of Cross Mountains scenery and wildlife, including antelope, mule deer, elk and bighorn sheep, this area is perhaps the only place in the state where all of these animals are found together.

There are approximately 1,875,000 acres of adjacent federal oil and gas properties available as potential reserves. Therefore I feel that the 14,000 acres at Cross Mountain

14

do not need to be held for additional oil and gas reserves.

In addition to Cross Mountain, I would further recommend the Cold Springs Mountain and the five small adjacent areas located at Dinosaur National Monument for wilderness designation.

The enjoyment of wilderness should be preserved for our children and our present and our future generations.

Respectfully,

Richard A. Quirk

15

March 5, 1986

Dear Mr. Pulford,

I am writing you as a new mother and concerned citizen of Colorado. I am frankly worried about the future of the northwest portion of our state. We seem to be at a place in time where we have the ability to preserve this precious area for future generations or destroy its unequalled value for temporary profits. I'm a little unsure of the BLM's reasons for offering "recreation management area" designation over "wilderness" status as this designation is quite inadequate in protecting this area. I hate to imagine that when my little baby becomes an adult area such as Cross Mountain with the Yampa River will no longer be the pristine area that it is today, but will have been exploited in search of oil and gas.

There are several similar areas in my opinion that have also been skipped over for wilderness designation. To name just a couple let me say that excluding both Cold Springs Mountain and Valley of Tears is basically eliminating precious wildlife. If Cold Springs and the areas adjacent to Dinosaur National Monument were to be protected with wilderness status Colorado would have a priceless region.

I would like to thank the BLM for recommending Diamond Breaks for wilderness designation and also recognizing the uniqueness of Irish Canyon. If we could just continue this support to the other areas we wouldn't have to worry about how our world is going to be for our children.

A couple other proposals that I find hard to fathom are 1) the BLM's refusal to consider Little Yampa Canyon for the Wild and Scenic and 2) why the BLM wants to wait for further studies on livestock grazing when it admits that much of its land is unsuitable for grazing already. If the present data indicates that livestock reductions are needed, the livestock should be reduced before it is too late.

I hope that the BLM makes its decisions wisely and in making their decisions I hope they keep future generations in mind.

Thank you for hearing my concerns.

Sincerely,

*[Signature]*  
Joni Ellis

March 6, 1985

Mr. William Pulford  
Bureau of Land Management  
Craig District Office  
655 Emerson Street  
Craig, CO 81625

Dear Mr. Pulford,

I have been advised that the BLM has decided against wilderness designation for the Cross Mountain area west of Craig after "studying" it for many years. I don't recall how long it's been since the last public meeting concerning this topic was held in Craig, but I do remember the content of the discussion as it was yesterday. I understand that more public hearings are in order as a result of this latest decision. Unfortunately, I will not be able to attend any of the scheduled meetings so I would like to take this opportunity to express my opinions on the matter.

First of all, I can only hope that the scope of this series of meetings is somewhat different than those that were held many years ago. At that time, the Jupiter Cross Mountain reservoir projects were the hot topic in Craig and the discussion was more about the pros and cons of building a dam in the canyon than its ability to meet the criteria of a wilderness area. I wrote your predecessor at that time concerning the content of the discussion and about my feelings about wilderness designation.

In the years that have passed since that time, the Cross Mountain area was to have been managed as a wilderness area since it was designated a WSA. I realize that it is hard for your office to enforce such an directive but I feel that the Cross Mountain area has been marked more by man in the last six years than it ever was before an interest was taken in it. This is an unfortunate turn of events as it did, at one time, meet all of the requirements of a wilderness area and would have been an excellent example of

the first such designation by the BLM in the state. As it is, I have witnessed vehicles on the south rim and the stumps of pinon and juniper trees cut for firewood in the same area on many occasions. In addition I have seen, and reported to your office, evidence of illegal trapping and poisoning throughout the canyon.

In spite of these transgressions I believe that the Cross Mountain area remains suitable for a wilderness area and should be so designated. I am well aware of the requirements for wilderness designation and have discussed them at length in previous letters as they pertain to Cross Mountain. The Craig District BLM has an excellent opportunity to set a precedent for the rest of the state and the nation to follow. I challenge you to resist the pressure of special interest groups that have already had their way in northwestern Colorado and make this one step towards preservation. It is time that a balance was struck between all of the area's energy related developments, human encroachment and construction and that of preservation of those things that are wild and untouched.

I would welcome your comments on this matter and look forward to hearing of some positive discussions concerning the suitability of wilderness designation rather than the suitability of the area for energy development and/or the construction of a reservoir. After all, these past six or seven years were supposed to have been spent studying the area for that reason. I believe that is what WSA stands for, correct?

Sincerely,

*MITCHELL W. LITTLE*  
Mitchel W. Little

3/6/86

To: William J. Pulford  
District Manager BLM  
Craig

From: Mike W. Crosby  
Wildlife property technician  
Spanish Parks Wildlife Area  
Box 23  
Bon Carbo, CO 81024

Dear Bill,

I have heard that the Cross Mnt. Area has been pulled from Wilderness status. This disturbs me. Being an avid kayaker & former resident of Craig, I've found Cross Mnt. to be very diverse, ecologically and also from a recreation standpoint unique.

Please, send me the reasoning behind this ruling. When doing S.V.I.M. for the Kremmling Resource Area, I was impressed at the species diversity & competition around Pec Gorge. I'm sure many species of threatened plants are in Cross Mnt. (Mustard Fan)

If the reason of Cross Mnt. denial as wilderness is because of water retention (i.e. caning), it seems somebody isn't looking at long term resource planning.

Thank you  
Mike Crosby

cc: R. Burford  
Denver  
File

(This letter was typed for reader clarity)

3/6/86 17

*TO: William J. Pulford  
District Manager BLM  
Craig.*

*From: Mike W. Crosby  
Wildlife property technician  
Spanish Parks Wildlife Area  
Box 23  
BonCarbo, CO. 81024*

*Dear Bill,*

*I have heard that the Cross Mnt. Area has been pulled from Wilderness status. This disturbs me. Being an avid kayaker & former resident of Craig, I've found Cross Mnt. to be very diverse, ecologically and also from a recreation standpoint unique.*

*Please, send me the reasoning behind this ruling. When doing S.V.I.M. for the Kremmling Resource Area, I was impressed at the species diversity & competition around Red Gorge. I'm sure many species of threatened plants are in Cross Mnt. (mustard fan)*

It's the reason of cross-mint.  
 detail as wilderness is because  
 of water retention (ie. damming)  
 it seems somebody isn't looking  
 at long term resource planning.

Thank you  
 Mike Craig

C.L. Rebutel  
 Amer  
 R/W

05-11-86 01:00 PM  
 05-11-86 01:00 PM  
 05-11-86 01:00 PM

18

June 1986  
 1732 E. Tavelon Dr.  
 Aurora, CO 80011

Mr. Fulford,

I am amazed and extremely dismayed that the BLM has  
 recommended against wilderness designation for the Cross  
 Mountain Wilderness Study Area. The area is beautiful  
 and ecologically diverse, and provides habitat for many  
 threatened and endangered species, including golden and  
 bald eagles. This area does not need to be exploited for  
 oil and gas, as there are almost two million acres of  
 federal oil and gas acreage in the vicinity. Cross Mountain  
 equals less than 1% of this available acreage! The BLM's  
 effort of "recreation management area" designation would  
 afford very little protection.  
 Please urge the BLM to reconsider their decision.

Sincerely,

Mark Udall

Mark E. Udall  
 2225 SHIMMONS - BOULDER, COLORADO 80501

19

March 7, 1986

Dear Sirs:

I have concerns about your  
 Grand Resource Management Plan. They  
 are as follows:

- 1) Cross Mountain should be reclassified  
 as a WSA. Its recreation and  
 wildlife characteristics outweigh any  
 oil and gas potential. There is almost  
 2 million acres of additional federal  
 oil and gas acreage in the area. The  
 17,000+ acres of Cross Mountain  
 should be set aside for wilderness.
- 2) Other WSAs - including Salt Springs  
 Mountain and the Five Dinosaur  
 Adjacent areas - should also be  
 recommended for wilderness. Particularly  
 important is Vale of Tears.
- 3) The Little Yampa Canyon should be  
 included under the Resource Management  
 Plan for inclusion in the wild

and Science Rules Act. At the least 19  
 the area should be designated as  
 Outstanding Natural Area.

- 1) Immediate Grazing Reductions should be  
 made now. Further monitoring, even  
 the large budget cuts proposed for  
 the BLM will not be done; if existing  
 data shows reductions are appropriate  
 they should be made now.

- 5) I support the actions in regard to  
 Diamond Peak, Iron Canyon and Limestone  
 Ridge.

I look forward to your response and  
 again urge wilderness recommendation for  
 the Cross Mountain WSA

Sincerely

Mark Udall

05-11-86 01:00 PM  
 05-11-86 01:00 PM  
 05-11-86 01:00 PM

20

3/1/86

Dear Mr. Pulford,

When I was in the Cross Mountain Wild  
 along the Springs and saw many higher  
 sheep hills and about 1000 feet, it was  
 the highest ever seen there. Only these were  
 created. Upon the plateau and there were  
 hundreds of antelope. As they ran among  
 the tall, yellow grasses and of course in  
 the grandeur of the Colorado mountains.  
 There was a large desert area with all my  
 life & people on the plateau of this area.  
 The management of this area for desert life,  
 and other means should be in  
 the best interests of the public.  
 Please reconsider & place Cross Mountain in  
 wilderness designation.

20-1

Thank you  
 Gary Langford  
 Peter Hart  
 Grand Junction  
 Colorado

21

Dear Mr. Pulford,

21-1 We sincerely hope you will change your recommendation against  
 wilderness in the CROSS MT. area.  
 Please think of the youth of the future who must try to  
 leave for then the magnificent beauty that once was Colorado.

The enclosed editorial from our own Colo. Div. of  
 Wildlife says it best.

sincerely,

Gloria Barron

March, 86

GLORIA E. BARRON  
 1346 Highway 83  
 Colorado Springs, CO 80908

22

321 Del Rey  
 Canon City, CO 81212

William J. Pulford  
 Craig District Manager  
 Bureau of Land Management  
 455 Emerson Street  
 Craig, CO 81625

Dear Sir,

Re: LITTLE SNACK RESOURCE AREA MANAGEMENT PLAN

22-1 I was recently surprised and disappointed to learn that the BLM has  
 recommended against wilderness designation of Cross Mountain  
 Wilderness Study Area. The unmistakable wilderness values of Cross  
 Mountain-stunning beauty; diverse ecology; crucial wildlife habitat  
 for threatened and endangered species. Make this area a logical  
 selection for wilderness. It would seem that an unbalanced trade-off  
 for dubious potential gas and oil potential has been struck. The  
 14,081 acres of Cross Mountain represents less than one per cent of  
 the other 1,978,000 acres of federal oil and gas acreage in the  
 vicinity.

22-2 Also, in the cases of Cold Springs Mountain and the five small  
 Dinosaur Adjacent Areas, my concern is that wildlife habitat is being  
 shuffled aside for oil and gas management. The BLM plan is  
 inconsistent with the more preferable plan of the Division of  
 Wildlife.

22-3 With regard to overgrazing within the land management area: if  
 existing data indicate that livestock reductions are appropriate, they  
 should be made now. By waiting for further monitoring studies (which  
 are in jeopardy in light of anticipated funding cutbacks) the BLM is  
 inviting severe erosion and water quality problems in the future.

Finally, the Management Plan was on target in recommending Diamond  
 Breaks for wilderness. I also commend the designation of Irish Canyon  
 as an "Area of Critical Environmental Concern" and Limestone Ridge as  
 a "Research Natural Area."

Sincerely yours,  
 Bruce Mohr  
 Bruce Mohr

23

Rosemary H. Prindle  
 1025 Southfield Rd.  
 Colorado Springs, Colorado 80919

3-6-86

23-1 D. Mr. Pulford  
 I am surprised and very  
 disappointed by the actions of  
 the BLM in rejecting the  
 Cross Mountain from designation  
 as a wilderness area. In your  
 job how could economic interests  
 prevail over the protection of  
 such a valuable natural area.  
 Rosemary H. Prindle



Denver 8-10-86

Dear Mr. Pulford,

BLM's Little Snake Resource Area has just released its Resource Management Plan, as, of course, you are aware.

- 24-1 The plan does not recommend wilderness designation for Cross Mountain WSA. In my opinion, this is an unfortunate oversight.
- 24-2 I'd also like to recommend the Little Yampa Canyon for formal evaluation of Wild and Scenic River status and would like to see Vale of Tears in wilderness designation.
- 24-3

I realize that reasonable people can disagree about just about anything. Sometimes we're inclined to argue economics of land management; sometimes basic values about esthetics. Still, in the case of Colorado as a state, I think one can make a reasonable case that our financial future as well as our general sense of what constitutes the so-called "quality of life" is in large part dependent upon our wilderness. Maximizing our wilderness should be as important as any other use for BLM land. I don't think it is at present.

Sincerely,

Bill Brooks  
1465 So. Clayton  
Denver, CO 80210

cc: Senators Hart &amp; Armstrong

(This letter has been typed for reader clarity)

Denver 8-10-86

Dear Mr. Pulford,

BLM's Little Snake Resource Area has just released its Resource Management Plan, as, of course, you are aware.

The plan does not recommend wilderness designation for Cross Mountain WSA. In my opinion, this is an unfortunate oversight.

I'd also like to recommend the Little Yampa Canyon for formal evaluation of Wild and Scenic River status and would like to see Vale of Tears in wilderness designation.

I realize that reasonable people can disagree about just about anything. Sometimes we're inclined to argue economics of land management; sometimes basic values about esthetics. Still, in the case of Colorado as a state, I think one can make a reasonable case that our financial future as well as our general sense of what constitutes the so-called "quality of life" is in large part dependent upon our wilderness. Maximizing our wilderness should be as important as any other use.

March 6, 1986

William J. Pulford  
Craig District Manager  
Bureau of Land Management

Re: Cross Mountain Wilderness Study Area

Dear Sir:

I am writing to express my dismay with the fact that the BLM has recommended against wilderness designation for the Cross Mountain area. Out of all BLM lands this area is certainly wilderness and requires protection. The combination of a wild river, unique geology, and crucial wildlife habitat should be considered a special environment which a wilderness study of any validity would not toss aside. As the recent BLM recommendation has done. Why? Is it that the BLM plans to destroy the area with oil and gas exploration when there is plenty of alternate acres nearby. Such a sacrifice would be a severe setback to our planet ecology. Please ~~think~~ think about the reality of the situation and not the short-term exploitation in the onslaught name of man's "progress".

Sincerely,  
Randy Kennedy  
Randy Kennedy  
P.O. Box 922  
Crested Butte, Co. 81224

for BLM land. I don't think it is at present.

Sincerely,  
Randy Brooks  
1465 So. Clayton  
Denver, Co. 80210

cc: Senators Hart &amp; Armstrong

Norm Mullien  
555 Grandview  
Boulder, CO. 80307

26

3/10/86

William Pulford,  
District Manager  
Craig Bureau of Land Management  
455 Emerson St.  
Craig, CO. 81625

Dear Mr. Pulford,

I am writing to comment on the Little Snake Resource Management Plan. Please include these comments in the official record.

First, I urge the protection of Cross Mountain as a Wilderness area. I have not yet had the pleasure of visiting Cross Mountain, but I have rafted and kayaked the Green River through Dinosaur, and really enjoyed coming to the free-flowing Yampa after running the rocky, dam-controlled Green.

I think that Cross Mountain is one of the outstanding examples of a superimposed canyon, and I am aware that it provides excellent habitat to eagles and bighorn sheep, as well as elk, deer, and antelope.

26-1 I also am aware that several species of endangered fish inhabit the Yampa, and any development of the canyon for water projects could harm these warm water fish.

I do not think that the potential for oil and gas should outweigh wilderness for Cross Mountain: there is very little in the northwest portion of Colorado that is not open to oil and gas development, and with potential oil shale development 30-40 miles away, there is a great need to protect some of this threatened part of the state for the present and future.

I also urge that you reverse the recommendation for Cold Springs and the Dinosaur adjacent areas, and that you recommend them for wilderness protection. I have not yet visited these areas, but I would like to.

26-2 I also ask you to recommend the Little Yampa for Wild & Scenic study. I participated in a raft, canoe, and kayak trip with the Colorado Mountain Club 3 years ago, and it was a very enjoyable, easy bedinner's trip. I do not understand your refusal to study it for Wild & Scenic status.

Finally, I support your recommendations for Diamond Breaks, and for Irish Canyon and Limestone Ridge.

Thank you.

*Norm Mullien*  
Norm Mullien

27

*J. Cope*  
*2/15/86*  
*West Valley, CO 80028*

*March 2, 1986*

*Mr. J. Pulford*  
*BLM*  
*455 Emerson St*  
*Craig, CO 81625*

*Dear Mr. Pulford:*

*I have written in reference to the recently released*  
*Resource Management Plan for the proposed*  
*Diamond Breaks area. I am concerned that the*  
*Wilderness designation will, in fact, be small.*

*27-1 Much of land adjacent to the Dinosaur Park is now*  
*being recommended for the proposed*  
*to be a wilderness area. I am concerned that*  
*the proposed area, which is a*  
*great area, rich in wildlife and of high scenic*  
*quality, is being recommended to be sacrificed for the*  
*potential of gas and oil. I am*  
*concerned that the proposed*  
*land will be lost to the*  
*public.*

*Please preserve this area!*

*Sincerely,*  
*John J. Cope*



United States Department of the Interior

BUREAU OF RECLAMATION  
1600 COURTESY BLVD. N. SUITE 100  
DENVER, CO 80202  
NAT'L LAND CHG. DIVISION

IN REPLY  
REFER TO:  
120.1

MAR 11 1986

Memorandum

TO: Mr. William J. Pulford, District Manager, Craig District Office,  
Bureau of Land Management, 455 Emerson Street, Craig, Colorado 81625

FROM: Regional Director  
Bureau of Reclamation

SUBJECT: Review of the Draft Little Snake Resource Management Plan and  
Environmental Impact Statement and its Wilderness Technical  
Supplement

28-1 We have reviewed the subject document and find it well written and concise. However, we found very little mention of potential water resource development in the resource area. The water resource section should be expanded to include areas of potential water resource development and how the various alternatives will impact future Federal, State, and private water development (i.e., Stagecoach, Juniper/Cross Mountain, Yellow Jacket, and Savary-Pothook). Also, there should be a discussion of the impacts of wilderness designation on water rights and potential water resource development in the resource area (especially Juniper/Cross Mountain).

None of the proposed alternatives will affect any active Reclamation interest in the area. Thank you for the opportunity to review this document.

*AC Mullien*

28

29

March 8, 1986

William J. Pulford, Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

Dear Mr. Pulford:

I am surprised and disappointed that the Bureau of Land Management has recommended against wilderness designation of Cross Mountain Wilderness Study Area. Cross Mountain is a wild, spectacular area with excellent opportunities for kayaking, hiking, and backpacking. Cross Mountain provides important habitat for numerous threatened or endangered species (Colorado squawfish, humpback chub, razorback sucker, peregrine falcon, golden eagle, and bald eagle). The area also includes petroglyphs and tool sheds.

29-1 The questionable potential for oil and gas reserves of Cross Mountain are rather insignificant compared to the obvious wilderness attributes. I hope you will reconsider your recommendation against wilderness for Cross Mountain.

Sincerely,

*David A. Hill*  
Dr. David A. Hill  
1650 Kohler Drive  
Boulder, CO 80503

Mr. J. J. Pulford  
Craig District Manager  
Bureau of Land Management  
Denver, Colorado

3/10/86  
30

30-1

Dear Mr. Pulford, I am writing you about the proposed designation of the Cross Mountain area as a wilderness area. I am sure that you are familiar with the area and the importance of it. I am sure that you are familiar with the area and the importance of it. I am sure that you are familiar with the area and the importance of it.

Please reconsider your recommendation and do not let this area be lost. The Cross Mountain area is a unique and important area. Please reconsider your recommendation and do not let this area be lost.

Mary L. Kerner  
705 E. Simpson  
Lafayette, CO 80026



32

1017 10 St  
Greeley, CO 80631

William J. Pulford  
Craig District Mgr.  
Bureau of Land Management

Dear Mr. Pulford:

Though I read a lot of the publicity about questionable BLM decisions on wilderness designation in Utah, I did not realize that similar problems may exist here in Colorado. I refer to the recent decision on Cross Mountain.

If ever an area were to epitomize low latitude Western wilderness, Cross Mountain is it. The area contains over 14,000 acres of the most stunning and ecologically diverse country in Colorado. The mountain itself is an upheaval in the path of the Yampa River, with the result being that the River has carved a deep gorge right through the mountain. Geologically, this is comparable to the Grand Canyon on a smaller scale, and would seem to merit special consideration on this basis alone.

32-1

As it flows—or rages—through this gorge, the Yampa now provides one of the most challenging white-water kayaking runs in America, and can be rafted or hiked at lower water. Big horn sheep, eagles, and other endangered species live there. But instead of wilderness designation, for some reason your office classifies it as a "recreation management area," thus leaving this rare and precious area open to degradation through mining. Ironically, however, the main mineral claims for the area are for limestone, which can surely be mined more cheaply in less remote areas. Administrative classifications that can be revoked when political pressures come to bear on the BLM have proved to be inadequate in protecting wilderness treasures. This is why I urge you to reconsider the Cross Mountain area for full wilderness protection.

Thank you for your attention.

Sincerely,

Paul W. Kerner

3-10-86  
31

William J. Pulford  
Craig District Manager  
Bureau of Land Management

Mr. Pulford,

It's hard to imagine how you can, nationally, justify eliminating Cross Mountain from wilderness consideration. All in the name of oil? For a few thousand acres of unimproved reserves?

31-1

Let me ask you this? How many people will benefit from the oil compared to the generations that will enjoy it if it is properly protected?

I sincerely hope this country is rich enough to set aside adequate wilderness for posterity. We won't get a second chance.

Sincerely,

Stan Berwin  
CVSR #2403  
Mont, UT 84532

33

33-1

the quickly depleted one from the depletion. I am sure that you are familiar with the area and the importance of it. I am sure that you are familiar with the area and the importance of it. I am sure that you are familiar with the area and the importance of it.

Sincerely,

Virginia Carter

It is interesting to urge you  
to change the recommendations  
for the L.H.'s Little Sister.  
Resources are, of strongly  
disagrees with several points  
of the Letters Management  
Plan for the area. My primary  
concern is the lack of primary  
recommended wilderness  
disagreement.

immigration. I have lived in Colorado for over eighteen years, with February season for remaining here at the Spectacular Society. My family has lived in Colorado for three generations - offspring - mostly on, always returning to Colorado - remarkable economy. I would hate to live away as incredible as Colorado - cannot see other children. Society was so all, gas, and for numerous people.

I urge you to include all WFOs in your communication. The documents which are obtained from registration are confidential, sensitive

Since our buying of the Pacific Lumber, we have been working for 14 years and now, in 1954, have been an investment 50% reduction in the P.L.T., then another one leading to more of our reduction is needed in some ways.

The "Nimrod" movement should be carried off, once and for all. Let's remove the dogs and the A.W.K. waiting in the wings, ready to "Nimrod" on any suitable negotiation that might someday occur. Thank you for your consideration.

His grand Co. 5th. United, Forest-Ranger  
April. Retired from US Forest Service  
after 16 years, working in Oregon  
& Washington mountains.

Wm. Williams, J. P. & Son  
151 N. 7th, Chicago, Ill.

$$234 \pm 5.2 \%$$

Due to financial considerations, the  
age and general condition, the  
wishes of the family, the Little Saskatchewan  
Records are being discontinued.

It is good that Dorothea  
Brucke is recommended as  
suitable for wilderness.

The other ridges should also be mentioned, the small one adjacent to the Winkelman, Coconino Mountain, and Cold Springs.

the ANST do a better job  
of taking care of our nation  
for the benefit of future generations

In spite of the present American  
tradition's prejudice in total and  
total obliteration, there  
is a parallel groundswell of

March, 13, 1986  
6538 E. Milan Pl.  
Denver, CO 80237

William G. Palford  
 raig District Manager  
 Bureau of Land Management  
 455 Emerson Street  
 Craig, CO 81625

Dear Mr. Fiske

The Resource Management Plan for the  
new Little Snake Reservoir, Ariz. State  
Colorado of its most valuable resource -  
wilderness. Especially disturbing is the  
omission of Cross Mountain from wilderness  
designation. The plan calls for the  
exploitation of Cross Mountain's minerals with  
the complete disregard of the scenery and  
unique wildlife. BLM needs to consider that  
the wildlife and recreation opportunities far  
outweigh the benefits gained from mineral  
exploitation in the long run.

I hope you and Bill realize that wilderness is a very valuable resource for us that live in Colorado and those that visit our state. Please consider this fact as you finish your Resource Management Plan.

Sincerely,  
Tedd Johnston



14 March 1986

William J. Pulford  
District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

Dear Mr. Pulford:

Those BLM personnel in the Craig district who were involved in field studies of potential wilderness areas are to be commended for their efforts. They succeeded in identifying all the areas which are essentially unaffected by man's interference, which offer real opportunities for a wilderness experience, and which are substantially free from any conflict with competing demands on resources.

Unfortunately, the good work of the people in the field has been almost completely undone by others in the office. The arguments favoring wilderness designation for the eight WSA's in the Little Snake Resource Area are well defined, and are quite consistent for all eight areas. By contrast, the arguments used by their superiors to eliminate all but one of these areas are vague, largely irrelevant, and pitifully weak--so weak, in fact, that any prudent observer can logically conclude that the rationales cited in the Resource Management Plan are not the real reasons for which these areas were rejected.

Since one cannot expect a bureaucrat to put down in writing why he chooses to go against the directives mandated by the Congress, one must read between the lines of the Plan to determine what these real reasons are.

The similarity between the Little Snake decisions and those of

other resource areas indicates that the first reason for the rejection of seven out of eight qualified wilderness areas is the quota. While no one in the chain of command would readily admit this, it is quite apparent that someone in the BLM has ordered his underlings not to recommend more than a minor fraction of WSA's to be designated as wilderness. So as not to make their motives too obvious, District Managers are allowed to throw a bone or two--in this case, Diamond Breaks--to the public. But the lack of correlation between the real worth of the areas as wilderness and their chances of being designated shows that such a quota system does indeed exist and has been followed almost universally by BLM.

The second reason for rejection is pressure by commercial exploiters of public lands. Mineral exploration companies in particular have long felt that all the public lands belong exclusively to them, and they are reluctant to share even a tiny fraction of those lands with the citizens who own them. Therefore they continually exaggerate both the extent of and the need for the potential mineral resources contained beneath those lands, even when there is no indication whatsoever that such resources really exist. Their political and economic power is great, however, and they usually have no difficulty in having their way.

The third reason, which is best exemplified by the WSA's adjacent to Dinosaur National Monument, is the laziness of BLM administrators. In an agency which has a long tradition of applying little or no real management to the lands under its jurisdiction, the idea that a genuine effort must be generated--even when that effort consists of no more than keeping the land from being destroyed--is repugnant. It is much easier to grant free reign to all exploiters, and to let the chips fall where

they may. Recent economy (?) measures which reduce BLM's ability to do its job in the field tend to exacerbate this situation even more.

The overall BLM wilderness situation greatly resembles that of the Forest Service several years ago. That agency too was reluctant to preserve the wilderness values of its land. But they forgot that the real decision was not going to be made by them, but by the Congress, which is far more responsive to the wishes of the public. Citizens' groups were forced to conduct their own studies and prepare their own proposals. In many cases, Congress realized that the citizens' recommendations were far more cognizant of the real values, and the Forest Service decisions were summarily ignored. This is the same task that must be followed once again. As a concerned citizen, I appreciate the field work you have conducted, but your conclusions supposedly based on that field work are such that I can only ignore them and proceed with my own proposals. In the case of the Little Snake Resource area, until valid reasons to the contrary are offered, these proposals can be nothing less than the recommendation of all eight areas as wilderness.

Respectfully,

*James R. Gaudagno*  
James R. Gaudagno  
353 County Road 5  
Hidway, CO 81452

1703 Wilson Avenue  
Apartment 403  
Loveland, CO 80537  
March 19, 1986

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

Dear Mr. Pulford:

On Monday, March 10th, I attended the meeting at the Remade Inn in Lakewood which gave citizens an opportunity to comment on your district's draft wilderness recommendation. I would like to add my voice to the voices of all those individuals who urged your office to reconsider your recommendation. I, too, was extremely disappointed to learn that out of eight Wilderness Study Areas your district intended to recommend only one area for inclusion in the National Wilderness Preservation System.

When we first came to this continent, nearly all of the land in North America could have been classified as de facto wilderness. In subsequent years, we spread ourselves throughout the country, destroying the wilderness in front of us as we went and never thinking that one day there would come a need to preserve what was left. Only in the last 25 years have we really become serious about preserving some of that heritage.

The Wilderness Study Areas now being studied by the Bureau of Land Management constitute only a small fraction of the remaining public lands which could be preserved. And now you're asking us to believe that only a small fraction of that small fraction is suitable for preservation. I won't buy it.

Many of the citizens of the United States are trying to tell you that if we could have our own way, we would preserve every last acre of our remaining natural lands. We recognize the need to compromise over those lands, but preserving one Wilderness Study Area out of a possible eight does not represent a compromise at all.

I am convinced that the philosophy of the Bureau of Land Management towards wilderness designation could be characterized by saying that the BLM will recommend an area for designation if and only if there are no development oriented potential uses for the area. Prove me wrong by recommending Cross Mountain and the areas adjacent to Dinosaur National Monument, as well as the one area you have already chosen, for inclusion in the National Wilderness Preservation System. All have outstanding natural values.

Thank you,

*Mark Collins*  
Mark Collins

Thursday, March 13, 1986

To: William J. Pulford, (Reg. Dist. Manager)  
BLM  
455 Emerson St.  
Craig, Colo 81625

From: Brad Cameron  
690 Peori, #4  
Durand, Colo 80803

Re: Wilderness

Dear Mr. Pulford:

I am writing you to urge reconsideration on your part of the recent BLM decision not to recommend the Cross Mtn. WSA for Wilderness designation. The Yampa River is one of Colorado's most spectacular, and in no area is it more spectacular than at Cross Mtn. This area must be protected!

I do want to support your decision to recommend Diamond Breaks, however. Please see the light on some of the other lists.

Also, I would ask that this letter be made a part of the record concerning the Wilderness Study Areas under your control.

Thanks,  
Brad Cameron

March 13, 1986

Dear Mr. Pulford:

As a resident of the state, very interested in preserving the environment, I was thrilled to learn of the BLM recommendation of Diamond Breaks for wilderness designation!

In the same breath, however, I must express my dismay at BLM's rejection of Little Yampa Canyon, Cold Springs Mountain and nearby areas close to Dinosaur National Monument, and especially Cross Mountain.

The area here is some of the most stunning and ecologically diverse country in northwest Colorado.

Cross Mountain, specifically, contains a system of unexplored caves, the Yampa River Gorge, and crucial habitat for many threatened and endangered species of wildlife, such as big-horn sheep, antelope, deer and elk. Furthermore, I understand that at least three dry holes were recently drilled in the mountain, hinting that maybe the speculation that the area is potentially rich with oil and gas, is FALSE.

Please reconsider the decision to explicit the above mentioned areas. We don't need anyone mining right now--have you checked the prices at the fuel pump lately?

Thank you for your time.

Sincerely,  
M. S. ROSSER  
Denver, CO

March 13, 1986  
Haybell, Colo. 81640

Dear Mr. Pulford,

Rather than write and complain about areas that are under BLM jurisdiction and praise them for their beauty and uniqueness I would like to make a few comments about the BLM in general. My map of NW Colorado, shows most acreage of BLM land, some ugly, some beautiful, some have minerals & oil, others provide grazing. Why not have, I say 20% of it totally alone just in case humanity needs it for diversity 100 - 200 - 500 years from now? Why does the BLM have the short term urge to "develop" everything? I'm reasonable, you still can have most of it, how about saving some for the future? sincerely  
mike l... ..

Dear Sirs:

I am writing in regards to the Little Snake River Resource Management Plan. Specifically in regard to the Cross Mountain Wilderness Study Area.

I wish to support the BLM's position that if not be made into a wilderness area, instead be protected from any development. (Otherwise left the same as it is.)

My personal wish is that the area not be changed, or altered in any way as much as possible.

I think this designation would do a better job of protecting it than would be done by making it into a wilderness area and calling more attention to draw people and activities than has already been done.

I live in the area, my family has lived here since 1906. I think not enough attention has been given to the changes that would take place on the surrounding private land and what the market would be for this land.

It is a very dry area, for my use I believe it takes 120 acres per cow. So for livestock use it does not have a great deal of value per acre. However, with the inflation of land values beyond what it will produce, until the last few years, it is worth a great deal. There are approximately seventy thousand acres in the immediate area belonging to ranchers that would be directly affected. They might no longer be viable operations, more than that if you figure acres of the land belonging to the same ranches, but not in the immediate area.

One ranch contains sixty four thousand acres. Only about thirty thousand acres in this area.

I wonder what the market will be for this land? What it will be used for and how much this will change the area?

I fear that one of the advantages to the area is that it has so many different kinds of animals, especially deer, antelope, elk and mountain sheep. There are also lots of coyotes and lions. Twenty years ago there were no elk, antelope, sheep, very few deer, three lions where now there are eight to ten and less than half as many coyotes. Many other types of animals have increased proportionally. The elk and deer are spending more time grazing in our fields than on the mountain, since they have pretty well grazed that off. There have been few if any cattle to help them on Cross Mountain. It has gotten to the point where I can move elk from one mountain to the other by which field I put cows in in the fall when the hunters get to bothering me.

Also we have had problems with vandalism of our property, camps and such. It has been just senseless wanton destruction where everything even the dividers between the stoves were broken out and the stoves smashed into little pieces.

I had the idea that these were simply the type of people who did that if they found their neighbor's house - they'd vandalize his house. However, after attending your meeting and seeing the violent animosity and hatred shown toward us there, I have come to the conclusion that (they) were after me personally. This I find hard to understand. If they figure it is in a condition to be worth coming several hundred miles to see, why should they attack those living there. Especially where they (in most cases) live where the environment has been completely altered, the land completely covered by concrete. The things they object to are almost all on private land. We don't have the services provided that "the people" expect. This does not produce the income "they" expect either.

I live in Lily Park. In the entire valley there is approximately thirty thousand acres of private land. If I had all of it I would be hard pressed to clear ten thousand dollars a year. I don't think that would make me unreasonably rich. I also don't believe "The People" would be willing to work the way I do even now.

As to the damage to the range. In the first place this range is very poor, rocky soil and very little moisture. There used to be a lot of livestock here belonging to people who didn't have permits off land, or have any right to be here. The game has increased to the point where, especially the elk, are doing a lot of damage especially on Cross Mountain and in my fields.

The government protected horses for some time, while these were originally our horses permitted to eighty head. Because of government restrictions they had not been managed or kept under control. At the time these horses were gathered there were six hundred of them.

The range is improving dramatically in that area, but there wasn't much left.

In summary I would like the present environment to remain the same, to the point of me being allowed to live here. I don't think that would be possible under a wilderness designation. Not only from the direct effects of that action, but also from the change in the market for the land and other things.

I don't think it would accomplish what it's proponents envision or want. I am willing to try and adapt so as not to bother them, but I think they should some times conduct themselves a little more like humans.

Sincerely,

Sam Rinker

*Sam Rinker*

Carol McCloud Die  
Box 922  
Telluride, CO 81425

William J. Relford  
Bureau District Manager, (Craig)  
455 Emerson St.  
Craig, CO 81625

Dear Mr. Relford,

I am distressed to hear that in the little shake in the area, the BLM is recommending only a small portion of the Diamond Breaks as a wilderness area.

I am sure that it includes an excellent area. The area includes a good spring, abundant, for small game, and a lot of natural resources. Little game, a good spring, a lot of natural resources, a lot of game, a lot of natural resources, a lot of game, a lot of natural resources.

46-1

Thank you,

*William J. Relford*

Mar 15, 1986

William J. Relford  
Bureau District Manager  
Craig, Co

Dear Sir,

I am writing to find out precisely why your office has recommended that Cross Mountain W.S.A. not be designated as wilderness.

I think there is little dispute that Cross Mountain represents some of the most outstanding wilderness values in Colorado. To keep such an area on the basis of preserving small amounts of speculative energy resources is, at best, shortsighted. At worst, such a decision demonstrates a complete contempt for wilderness and for the majority of citizens who support appropriate wilderness designations.

Be assured that when the BLM, its FLPMA recommendations, and its budget, are subjected to Congressional review, that your hostility to wilderness designation for even spectacularly appropriate areas will not be forgotten by people like myself.

Yours truly,

Ronald Vach  
23 Paul St #212  
Denver, Co. 80203

William J. Relford  
Craig District Manager  
Bureau of Land Management  
455 Emerson St.  
Craig, CO 81625

Dear Mr. Relford,

I am taking this time to write to you personally since I am appalled at your recent wilderness recommendations for Northwest CO. Thank you for Diamond Breaks, but Cross Mtn, Cold Springs and Dinosaur adjacent areas are certainly deserving and have minimal to no conflict with the multiple use ethic.

The vast majority of adjacent land is still open for grazing - oil & gas exploration. One cannot deny the areas scenic & recreational assets which make them deserving of wilderness status.

Please reconsider your withholding of these important wilderness assets. Northwest CO is still beautiful and we have a moral and ethical responsibility to keep it that way.

From a former and hopefully continuing user of these areas I ask for wilderness protection.

Thank you,  
Lube S. Erdos, MD  
Denver CO.

47-1



March 13, 1986

Dear Sirs:

I attended the public hearing for the Little Snake RMP in Lakewood, Colorado on March 13. At that time I obtained the RMP and Wilderness Technical Supplement (WTS) documents. I did not make oral comments that night because I had not had the opportunity to review the documents. After listening to comments at the hearing and having finished reviewing the documents, I would now like to submit my own written comments here.

I find the recommendations of the BLM to be biased, shortsighted and at times ludicrous. First of all Ant Hills, Chew Winter Camp, and Peterson Draw WSA's should have been studied as one combined WSA. I do not understand what the rationale was to split up a complete block of land into three WSA's. In the WTS the three WSA's are evaluated as a combined unit but the exact same comments and conclusions are reached for the combined unit as for the separate units. It seems that the combined unit analysis was compiled only as an after thought. A combined unit WSA of 10,534 acres adjacent to Dinosaur National Monument (DNM) will add significantly to the wilderness values within DNM. All three WSA's are concluded to offer excellent opportunities for solitude. To me this means that in and of themselves the areas do, rather than do not (as you conclude), possess outstanding wilderness values. It cannot be ignored that these areas are directly adjacent to DNM and include the upper reaches of drainages which flow into DNM. Protecting lands up to the geographic divide north of DNM will add significantly to the scenic values of the monument. Specifically this will enhance off river hiking opportunities from within DNM. I have personally explored both the Warm Springs and Five Springs Draw drainages from the river. Inclusion of these three WSA's in the BLM wilderness systems will preserve the remote character and scenic vistas experienced while hiking these drainages. Also there are few, if any real resource conflicts within the Ant Hills, Chew Winter Camp and Peterson Draw WSA's. Your rationale for nonrecommendation of these WSA's is unsubstantiated.

As with the combined WSA's, the proximity to DNM and the opportunities for solitude in the Teepee Draw and Vale of Tears WSA's have been ignored by your analysis. Both of these areas will add substantially to wilderness values within DNM. Again, both areas show little real resource potential and few conflicts with resource development. The WTS analysis of these two WSA's continually states that these areas' attributes and contributions to the wilderness system is "minor" when considering other areas being recommended as wilderness. These two areas constitute 12,720 acres. Areas recommended for wilderness designation in the Little Snake resource area amount to 35,350 acres. These two "minor" additions can increase the amount of wilderness being recommended by over 36%. If the three combined WSA's are included, which have also been termed "minor", it would amount to a 62% increase. I don't consider a 62% increase minor!

I would also like to comment on the Cross Mountain WSA. Of all the WSA's in the Little Snake Resource Area, Cross Mountain WSA affords the best opportunities for solitude, wilderness recreation, and wild life viewing. It is also the most scenic and spectacular. Cross Mountain is



49  
Land is an organism. When we see land as a community to which we belong, we may begin to use it with love and respect.  
There is no other way for land to nurture the impact of mechanized man.  
Aldo Leopold

13 March 1986

Mr. William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, Colorado 81625

Dear Mr. Pulford,

The one hundred-member Uintah Mountain Club would like to go on record supporting the concept of Wilderness designation for the areas adjacent to Dinosaur National Monument which have been delineated by the term "Wilderness Study Area" in draft Resource Management Plan for the Little Snake Resource Area. Although we have not reached a consensus on the extent and composition of the areas which should be included in the National Wilderness Preservation System, we feel that, in general, these areas possess the requisite characteristics that make them equally suitable to join the many wonderful lands which have already received the designation Wilderness.

We must emphasize that determination of whether an area is suitable for Wilderness designation should not be based on above or below-ground mineral characteristics or economic value to the ranching, farming or industrial communities. Suitability has nothing to do with the economic value of the land to human users. Suitability is a quality judgment, and should be based upon the inherent natural values of the land. Thus, an area should not be disqualified as suitable because of economic plans or mineral wealth. It is important to make this distinction. An area must be declared suitable for Wilderness designation if it meets the criteria for Wilderness according to the guidelines set forth in the National Wilderness Preservation Act and other legislation pertaining to unroaded areas extent in the Federal Lands Policy and Management Act of 1976. Only Congress, not the Bureau, can determine whether a candidate area should be designated as Wilderness, and this decision can, indeed, be made on the basis of economic value judgments. Only Congress should decide whether the economic values of the land out-

what the National Wilderness Preservation System is all about. With the recent exploratory drilling disappointments near the mountain oil and gas potential for the WSA has dwindled rapidly. Your documents (WTS, RMP) do not mention the possibility of a dam on the Yampa River in Cross Mountain, so why was the WSA not recommended? If not water, what resource conflicts exist for the WSA? As a friend of the Yampa River, I am concerned about preserving its free-flowing character and wilderness canyons. It is the last free-flowing tributary in the whole Colorado River drainage. Wilderness designation for Cross Mountain can only help in the larger effort to maintain the Yampa's free-flowing character. I would like my children to be able to experience the wild Yampa during spring run-off as I have. Cross Mountain WSA has more to offer than any other WSA in the resource area, and I am outraged that it was not recommended for wilderness designation.

In conclusion I would like to express my support that all eight WSA's in the Little Snake Resource Area (LSRA) be recommended for wilderness designation. Within the 2.4 million acres of the LSRA I'm only asking for protection of 90,887 acres. This amounts to only 3.8% of the LSRA. Over 96% is left open to full scale development. Under the BLM's multiple use mandate all I ask for is a sense of balance. There is clearly room for much more than just the Diamond Breaks Wilderness in the LSRA. Is 3.8% too much to ask so that we may preserve a bit of wild America for generations to come?

Sincerely,

Robert Tubbs Jr.  
Robert Tubbs Jr.

weigh the natural values of the land. If this distinction is not made by the Bureau of Land Management, then a serious flaw exists in the evaluative process. Often, legislative decisions are made on the basis of Bureau recommendations alone. Uninterested legislators from other areas may then participate in an action in an automatic and less than critical fashion. Legislative action may proceed without all the information necessary to ensure that the long-term interests of the public are adequately represented.

There is evidence that the evaluation process may be flawed when potential economic values disqualify areas such as Cross Mountain, astride the Yampa River. I repeat, the appropriateness of Wilderness designation is a legislative decision. Suitability stands alone.

We are pleased but not overly-encouraged that the Diamond Breaks WSA was recommended, but one is led to the conclusion that this area was declared suitable only because no economic value could be attached to the area. This is not a reason to recommend that an area be designated Wilderness.

We applaud the decision to designate Irish Canyon as an "Area of Critical Environmental Concern". We feel this should give adequate protection to a very special area.

We support the inclusion of Little Yampa Canyon in the Wild and Scenic Rivers system, and we are disturbed that the BLM refused to consider Wild and Scenic status for this section of the river in their Resource Management Plan. We feel certain that this decision in large measure reflects the anachronistic idea that yet another dam may be needed on a wild Western river. The era of dam building has come and gone. In a time of concern for the federal deficit and burgeoning government expenses, we can no longer expect the federal government to fund large public works projects for the benefit of the private sector. Typically, these projects involve a poor cost/benefit profile, and frequently destroy areas of outstanding riparian, esthetic and recreational value. We feel that an undammed Yampa River deserves more consideration and protection than it has thus far received.

Further written comments and recommendations will be submitted by individuals and by the Uintah Mountain Club prior to the May 9 deadline.

Thank you for your attention and interest.

Best regards,

Will Durant, President  
Uintah Mountain Club



DEPARTMENT OF THE AIR FORCE  
AIR FORCE REGIONAL CIVIL ENGINEER CENTRAL REGION  
1114 COMMERCE STREET  
DALLAS TEXAS 75242

11 MAR 1986

Mr. Kannon Richards, State Director  
Colorado State Office, RLM  
2020 Arapaho Street  
Denver, Colorado 80205

Dear Mr. Richards:

Thank you for allowing us the opportunity to review the Draft Resource Management Plan and Environmental Impact Statement for the Little Snake Resource Area, Colorado.

We continue to express our support of the RLM in developing functional management plans for lands under its control. The Air Force concern for these management issues contains the need to retain use of existing and the establishment of future military flight training areas and routes which may traverse these areas.

Currently no Air Force air operations traverse any portion of the study area. Although flight training areas, routes, and airspace requirements of the military are subject to change and do change frequently, it is not anticipated that new routes will be established in the immediate future.

We are hopeful this information is useful in your planning. If additional information is needed, our staff point of contact is Mr. Raymond Bruntzger, (214) 652-1341, or FTS 760-1341.

Sincerely,

*Don Michael Bruntzger*  
DON MICHAEL BRUNTZGER, Major, USAF  
Director, Environmental Planning Division

Cy to: HQ USAF/LEEN

50

51

Diana Grunig  
316 Triceratops Terrace  
Dinosaur, Colorado  
P. O. Box 246  
Rangely, CO 81648

March 19, 1986

Program Manager  
Little Snake Resource Management Plan  
Little Snake Resource Area  
Craig District Office  
Bureau of Land Management  
425 Emerson Street  
Craig, Colorado 81625

Dear Sir:

This letter addresses the decisions published in the Wilderness Technical Supplement to the Little Snake Resource Management Plan and Environmental Impact Statement on the Wilderness Study Areas identified under the authority of Section 602(a), PLPRA: Diamond Breaks, West Cold Spring, and Cross Mountain.

The Summary Analysis and Recommendations and supporting documentation for these three areas make a clear and convincing case that they all have wilderness value and meet the legal requirements for wilderness designation. Two areas, West Cold Spring and Cross Mountain, are not recommended for wilderness designation in spite of their impeccable qualifications. The reasoning seems to be that a) there are conflicts on some small portions of the acreage near the proposed boundaries, with potential grazing and especially oil and gas development, b) there is a potential dam site in the Cross Mountain WSA, and c) there is potential for oil and gas development in all three areas.

I agree that Diamond Breaks should be recommended to Congress for wilderness designation. But none of the considerations given seem to me sufficient reason to exclude West Cold Spring and Cross Mountain from this same recommendation.

51-1

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No pressing need has been demonstrated for a large dam in this Resource Area, for either water storage or power, much less a dam at a location in Cross Mountain Canyon, and there is no money in the budgets of either state or federal government for another dam. It is undoubtedly true that these areas have oil and gas potential, but most of the Little Snake Resource Area has oil and gas potential, and much of the rest of northwestern Colorado, northeastern Utah and adjacent Wyoming has this potential as well. There is plenty of acreage for oil and gas exploration there are only small areas remaining with wilderness characteristics, and they should receive proper legal protection. There would seem to be no short-term or grazing land in this Resource Area. Your documentation indicates a loss of only 75 RLM's if all three of these areas are designated wilderness surely this is not sufficient to justify denying these blocks of land wilderness status.

In many cases, the conflicts to be resolved by the Conflict Resolution Alternatives do not seem to me to be severe enough to warrant losing a scarce resource to resolve them. Excepting the land leased to the Browns Park State Wildlife Refuge, which shares many of the same goals as a designated wilderness would, most of the other concessions seem to be unnecessary. Conflict Resolution Alternatives would certainly be preferable to no wilderness designation at all, and the changes to Cross Mountain and Diamond Breaks WSA's seem relatively minor, and perhaps basically beneficial, but there should be greater justification for the resolution of conflicts in West Cold Spring by destroying so much wilderness resource.

The area involved in these three designations is only about 2% of the area of the Little Snake Resource Area, and not a significant contributor to the area's economic base either now or for the foreseeable future. If future generations decide that the oil and gas or other resources must have a greater priority, whatever is there to develop will still be there. If wilderness status is not granted to these lands, by your own statements wilderness quality will disappear and future generations will have no choice. I am a geologist for an oil company, so naturally I am concerned that the needs of the petroleum industry be considered, but I am also a citizen and a resident of this area, and I don't feel that oil and other resources have to be developed at the expense of a fragile and disappearing wilderness.

This area does not fit the preconceived notion that people seem to have of Colorado wilderness there are no swift mountain streams, aspen groves, or fisherline vegetation. Neither are there the spectacular rock stupas that are mentally associated with Utah's wild places. But the area has its own appeal to those of us who have come to

know it, and I think all three of these tracts should be preserved so that future generations will be assured a chance to know it too.

Sincerely,  
*Diana Grunig*  
Diana Grunig

cc: Will Durant, Uintah Mountain Club

52

March 15, 1986

William J. Pulford,  
Bureau Land Management  
455 Emerson  
Craig, Co 81625

Sir,

The BLM is wrong in many of it's latest study and recommendation. I am appalled at the latest decision regarding Cross Mountain to Call IT "THE Recreation Management Area" when we very well know that it should be wilderness. By changing it to non-wilderness recommendation, you will be endangering many wild animals to provide room for potential oil resources. It is inexcusable that you should choose to destroy such wilderness.

52-1

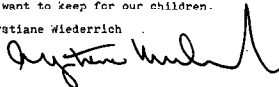
Your knowledge of other wilderness areas seems to be poor and not researched. Ex: Cold Springs Mountain... The 17,000 acres comprise less than 1 percent of the total available mineral in the vicinity and you insist on sacrificing the wildlife values.

Look at the poor management regarding Little Yampa Canyon, Irish Canyon etc.

All your recommendation against wilderness are outrageous and you should revise your studies before you continue to endanger what we want to keep for our children.

Christiane Wiederrich

4608 Greenbriar Ct  
Boulder Co 80303



53

335 17th St  
Boulder Co 80502  
March 19, 1986

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, Colorado 81625

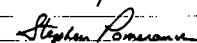
Dear Mr. Pulford:

I am distressed that you did not recommend the Cross Mountain area for wilderness study. It is a beautiful & pristine area, unique in its combination of habitats, and diverse in its ecology & scenery.

53-1

I urge you to reconsider & recommend it for wilderness.

Sincerely,



54

3/18/86

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

Dear Mr. Pulford:

I am deeply concerned about the recommendation recently made by the BLM for Cross Mountain. Recently it seems mining & oil interests have taken precedence in your decision making about Wilderness Areas. The Cross Mountain area is a crucial habitat for many endangered species as the Peregrine falcons, Golden & Bald eagles, Squawfish and humpback chub, and the razorback sucker. We must not ignore the gorge the Yampa river has cut 1000 feet down making it a place of extreme beauty. Also, creating one of the most challenging whitewater kayaking runs in the county. Hikers can also enjoy the canyon and see bighorn sheep as well as antelope, elk & deer. This is a true rarity in Colorado that is very special. I fail to understand why the BLM want this land for oil & gas development when they have 1,878,000 acres of federal land in the same area for that purpose. We need to change Cross Mountain to Wilderness status as soon as possible.

54-1

I wish to thank the BLM for the recommendation of Diamond Break area as a wilderness area. It was greatly appreciated and you have my support.

I do not support the BLM recommendation for the Cold Springs Mountain area. When this parcel of land is less than 1% of the total mineral acreage available in the area, it seems a lack of concern for the wildlife concerned. We have a special opportunity to help preserve our disappearing wildlife habitat here, I highly recommend changing the status of Cold Springs to Wilderness.

The Dinosaur Adjacent areas has not been recommended for Wilderness which is a mistake. Those 5 areas are very important to the park as they topographically complete it - humdrum. The most vital of these sites are "Vale of Tears" located across from the Deer Lodge Park. These areas would enhance and secure the beauty, insure the preservation of the park for the future.

54-2

There are a couple of other important issues that I feel need to bring to your attention. The Little Yampa Canyon has been identified by the Natural Park Service as worthy of protection under the Wild and Scenic River Act. Yet, BLM has not acted on request for evaluation. I feel very strongly that should be done. We must protect the Yampa River, at least make it an Outstanding Natural Area so it does not become a reservoir and destroy the whole river. Secondly, I wish to address the problem of livestock grazing and the BLM failure to adequately study the situation. You have stated that 1/3 of the land management areas is unfit for grazing. Yet, you are continuing present policies. This is a cause for grave concern, as a problem unchecked will become a crisis. The damage that will occur has a high chance of being permanent.

54-3

2

I do not think that even the BLM would like to face the problem. I urge you to take action on immediately.

I wish to express my appreciation for your recommendation of Irish Canyon and Limestone Ridge. It's a good feeling when things are accomplished and you have my support on this. In closing, I appreciate your time and consideration of the several projects I have mentioned.

Sincerely,  
Janis J. Harper  
P.O. Box 296  
Black Hawk, CO 80422

(This letter has been typed for reader clarity)

54

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

3/10/86 54

Dear Mr. Pulford:

I am deeply concerned about the recommendation recently made by the BLM for Cross Mountain. Recently it seems mining & oil interests have taken precedence in your decision making about Wilderness Areas. The Cross Mountain area is a crucial habitat for many endangered species as the Peregrine falcon, Golden & Bald eagles, Spotted Owl & Humpback Chub, and the Kermadec sucker. We must not ignore the gorge the Yampa river has cut 1000 feet down making it a place of extreme beauty. Also, creating one of the most challenging whitewater kayaking runs in the county. Hikers can also enjoy the canyon and see bighorn sheep as well as antelope, elk & deer. This is a true rarity in Colorado that is very special. I fail to understand why the BLM want this land for oil & gas development when they have 1,578,000 acres of federal land in the same area for that purpose. We need to change Cross Mountain to Wilderness status as soon as possible.

I wish to thank the BLM for the recommendation of Diamond Break area as a Wilderness area. It was greatly appreciated and you have my support.

I do not support the BLM recommendation for the Cold Springs Mountain area. When this parcel of land is lost then 1% of the total mineral acreage available in the area, it seems a lack of concern for the wildlife concerned. We have a special

opportunity to help preserve our disappearing wildlife habitats here. I highly recommend changing the status of Cold Springs to Wilderness.

The Dinosaur Adjacent areas has not been recommended for Wilderness which is a mistake. These 5 areas are very important to the park as they topographically complete it. The most vital of these sites are "Yalest Tears" located across from the Deer Bridge Park. These areas would enhance & secure the beauty, insure the preservation of the park for the future.

There are a couple of other important issues that I feel need to bring to your attention. The Little Tampa Canyon has been identified by the National Park Service as worthy of protection under the Wild and Scenic River Act. Yet, BLM has not acted on requests for evaluation, I feel very strongly that should be done. We must protect the Yampa river, at least make it an Outstanding Natural Area so it does not become a reservoir and destroy the whole river. Secondly, I wish to address the problem of livestock grazing and the BLM failure to adequately study the situation. You have stated that is of the land management areas is unfit for grazing. Yet, you are continuing present policies. This is a cause for grave concern, as a problem unchecked will become a crisis. The damage that will occur has a high chance of being permanent.

③ 54

I do not think that even the BLM would like to face the problem. I urge you to take action on immediately.

I wish to express my appreciation for your recommendation of Irish Canyon and Limestone Ridge. It's a good feeling when things are accomplished and you have my support on this. In closing, I appreciate your time & consideration of the several projects I have mentioned.

Sincerely,

Janina J. Harper

Janina J. Harper  
P.O. Box 298  
Black Hawk, CO  
80422

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March 18, 1986

Mr. William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson St.  
Craig, Colorado 81625  
Dear Mr. Pulford:

I want to protest most vigorously the BLM decision to recommend against wilderness designation for the Cross Mountain Wilderness Study Area. This area, just upstream from Dinosaur National Monument, certainly is worth preserving--it contains bighorn sheep, eagles, elk, and peregrine falcons. The scenery is unparalleled.

55-1 This country is irreplaceable; there are almost 2,000,000 acres of federal oil and gas acreage in the vicinity; Cross Mountain amounts to less than one percent of this available acreage!

Sincerely,

Janine Lane  
Mrs. Lorraine Lane  
3505 W. 39th Ave  
Denver CO 80211

56

Andrew McElroy  
3590 Buckley Ave  
Boulder, CO 80503  
March 16, 1986

William Pulford, BLM District Manager  
455 Emerson St.  
Craig, CO 81625

Dear Sir:

I was horrified to learn that of the fine wilderness in the Little Snake Resource Area, the BLM recommended only Diamond Breaks for designation. Indeed, Diamond Breaks is suitable, but by no means the most suitable area under consideration. Cold Springs Mountain is famous for its wildlife and the word "preposterous" comes to mind upon hearing that the BLM has concluded mineral extraction and cattle grazing offer superior value than preservation of the exceptional abundance of wildlife. I favor annexation by the National Monument of the Diamond Adjacent Area and hope that major portions of the monument will be protected as wilderness. Deletion of Cross Mountain from our wilderness system would be an extreme tragedy, and BLM's failure to recognize this fact provides undisguisable evidence that the recommendations for Little Snake Resource Area are next to worthless. We are faced with a very unfortunate situation, and I can only hope that the BLM's final recommendations will be considerably different from what we have seen so far.

Andrew McElroy

3-15-86

57

Dear Mr. Pulford:

I just learned through Sierra Club channels that the BLM recommended against wilderness for ~~Cold Springs~~ Mountain.

Having spent a few weeks in that area, I can attest ~~to~~ to its suitability as a wilderness area. I especially enjoyed the forests and vistas of the higher area.

57-1

I urge you to reconsider the BLM's decision.

Sincerely,  
Steven Kellon  
1600 Hillside Rd  
Boulder, CO 80302

58

949 Krameria Street  
Denver, Colorado 80228-4616  
March 18, 1986

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, Colorado 81625

Dear Mr. Pulford:

I am writing to express my concern and outrage at the recent BLM recommendations for the Little Snake Resource Area. While I was heartened to learn that the BLM recommended the Diamond Breaks area be given Wilderness status, it is unbelievable to me that no other area in the Little Snake Resource Area is worthy of such protection. Of the 91,000 acres studied only 36,000 acres should be protected in this way.

58-1

As a member of the Colorado Native Plant Society, I was also glad to see that the BLM has proposed Special Management Area status for four areas in which rare or endangered native Colorado plants are found. However, these areas (encompassing only about 21,000 acres) represent just a small portion of what the BLM should be protecting.

58-2

I urge the BLM to include Ink Springs, G-Gap, Horse Draw, and Bell's Canyon in Special Management Areas. These four small inclusions total only 1,525 acres, but would provide protection to at least six rare plant species and several endangered plant associations of critical national concern.

The Little Snake Resource Area is diverse geologically and, hence diverse and unique ecologically. We frequently take such areas for granted, but we are all too rapidly coming to a point where we will have developed and irreparably damaged so many of these areas that we will have lost a significant part of our natural heritage. The acreage under present discussion is insignificant when the 1,076,000 acres of federal oil and gas acreage is considered. This area should not be developed but protected and preserved for the benefit of coming generations.

Thank you for giving me this opportunity to express my concerns over your management proposal. I hope you will take my, and other's, comments into consideration when drawing up the final Resource Management Plan.

Sincerely,

ELR-H

455 Emerson Street, W  
Boulder, Colorado 80501  
March 19, 1986

59

Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

Dear Mr. Pulford:

We need more land. The land proposed for wilderness, I think to the BLM, is not. We will benefit from seeing this land from development, as population increases. We will need this wilderness as a place to go to get away from too many people. With all the land available for development and resource use, in such desirable areas, it would be to our advantage to protect those areas of land with especially outstanding wildlife and scenic values. The acre land we develop, the land there will be available for the protection and preservation of wildlife. It may concentrate or disperse all of our most valuable wildlife areas, what will become of us? We cannot live alone in this world. Make our country as a species will be improved if we do not try to mine the earth for more resources. It is a tragedy that we need to start trying to use what we have more creatively.

59-1

I am particularly concerned by your lack of action in designating certain areas in northwest Colorado as wilderness areas, especially the Cross Mountain Wilderness Study Area.

Sincerely yours,  
Carol Pulford  
Carol Pulford



# American Wilderness Alliance

7600 East Arapahoe Road / Suite 114 / Englewood, Colorado 80112 / (303) 771-0380

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March 20, 1986

Mr. William J. Pulford, District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

Dear Mr. Pulford:

Enclosed is the statement of the American Wilderness Alliance concerning the Little Snake Resource Area's Draft Resource Management Plan.

I regret that I was unable to present this statement at your March 10 public hearing in Denver. Would you please make it a part of the official hearing record?

Thank you for your attention to this matter.

Sincerely,

*Clifton R. Merritt*

Clifton R. Merritt  
Executive Director

CRM:dbb

enclosure

Statement of Clifton R. Merritt  
Executive Director, American Wilderness Alliance  
for the Public Hearing of the Bureau of Land Management  
on March 10, 1986, in Denver, Colorado  
regarding the Little Snake Draft Resource Management Plan  
and Wilderness Area Recommendations

I am Clifton Merritt, Executive Director of the American Wilderness Alliance.

The American Wilderness Alliance is a Colorado-based national non-profit organization dedicated to the conservation and proper use of the nation's decreasing publicly owned wildlands, wildlife habitat and free-flowing rivers.

We have members throughout the United States, including in Colorado. Many of our Colorado members have used and enjoyed the wildlands and the Yampa River in the Little Snake Resource Area for wilderness horseback trips, hunting, camping and sightseeing. They have made much use of the Yampa River in this area for canoeing, kayaking and rafting trips. I have visited the Resource Area, its principal wilderness study areas, as well as the Yampa, and I am familiar with their characteristics and resources.

We and our members are pleased that the Bureau of Land Management has recommended the 36,000 acre Diamond Breaks Wilderness Study Area for wilderness status. We strongly support this recommendation.

As I stated in my March 8, 1985, letter to the Assistant Area Manager Glenn Sekavec, following my visit of the Resource area and participating in the BLM public meeting with the staff in Craig on March 5, Diamond Breaks generally is of high wilderness quality. Its scenic breaks and ridges running to the Yampa River and adjoining Browns Park Wildlife Refuge and Dinosaur National Monument would complement and supplement these outstanding natural attributes. As wilderness, Diamond Breaks would also contribute to the well-being of the important elk and deer herds, in addition to maintaining quality wilderness hunting for these species.

However, we are very disappointed with other parts of the draft Plan as it pertains to wilderness, wildlife and the Yampa River. In regard to these valuable resources, we find

Working Together To  
Conserve Wild America

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that despite our considerable input during the informational public meetings a year ago the Plan has been improved very little.

Specifically, we respectfully urge that the Plan be revised to include, as we requested a year ago, the following:

1. Wilderness status for the Cross Mountain WSA, 13,450 acres.

This spectacular rugged river canyon area is eminently qualified for a wilderness classification. It has long been considered and used by our members as wilderness. It possesses major wilderness-associated wildlife values, including elk, bighorn sheep, wintering bald eagles and antelope. It serves as a golden eagle nesting area, and as a migration corridor for both species of eagles. Cross Mountain WSA is also existing habitat for prairie falcons. The U. S. Fish and Wildlife Service reports that the area provides habitat for the endangered peregrine falcon. As wilderness, it would provide ideal habitat for restocking and furthering the recovery of this species.

A highly scenic, wild reach of the Yampa River flows through Cross Mountain WSA and significantly enhances the value of the area for wilderness status. This reach of the river supports some of the most exciting kayaking in Colorado. It is also habitat of two threatened and endangered species, the humpbacked chub and Colorado squawfish.

A wilderness classification would substantially protect and enhance fish and wildlife values of the threatened and endangered species, as well as those of the elk, bighorn sheep and others. Quality wilderness hunting of these big-game animals would be preserved.

All of these irreplaceable amenity resources and values make Cross Mountain a superb unit for wilderness protection. The BLM's proposal of a Recreation Special Management Area designation for the tract is largely meaningless, would allow oil and gas exploitation and other development, and would not assure adequate long-range protection, as provided by the 1964 Wilderness Act.

Moreover, oil and gas interest in the area is purely speculative. Irreplaceable wilderness and wildlife values are present and real. Oil and gas exploration and development would destroy the wilderness resource and critical habitat for wilderness wildlife.

Wilderness status for the area would exclude 631 acres because of possible mineral conflicts and ORV use associated with grazing and hunting.

2. Wilderness status for West Cold Spring Mountain WSA, 17,682 acres. This exceptional area in extreme northwestern Colorado is well qualified for wilderness designation under the Wilderness Act. It is the irreplaceable home of important herds of elk and bighorn sheep. Both of these species are wilderness-dependent. This means that if the area is developed, the herds of elk and bighorns will vanish. Elk, as well as deer, which are common in the area, provide hunters with quality wilderness hunting. The Colorado Division rates West Cold Spring WSA as one of its finest quality elk hunting areas on BLM lands in Colorado and desires to increase and manage this herd for trophy bull elk hunting. With elimination of livestock overgrazing, this outstanding area could carry an even larger elk population. However, livestock grazing per se is not in conflict with a wilderness designation.

Again, oil and gas consideration is entirely speculative. But oil and gas exploration and development would destroy forever existing wilderness and wilderness-dependent wildlife values.

3. Wild and scenic river study for the Yampa River from Dinosaur National Monument to Craig. The Yampa is the only free-flowing river left on the Colorado Plateau. Surely, it is in the public interest and not too much to ask to leave one river in this entire region without dams, diversions or other developments. Moreover, such development would alter and adversely impact riverflows of the Yampa, and thus its threatened and endangered fisheries, wildlife and other park values, in Dinosaur National Monument.

Below Craig, the river is important canoeing water. This is a growing industry that benefits the Craig economy. Further downstream, the Yampa is noted for its exceptional kayaking, while the segment toward the monument is very popular for rafting. The American Wilderness Alliance annually sponsors river trips for its members and cooperators on this last-mentioned reach of the river and in the monument. Trip participants come from all over the United States. The river supports a substantial outfitting and guiding industry.

We accordingly ask that the BLM recommend a wild and scenic study of the Yampa from the monument to Craig, and that the BLM review management of the entire river above the monument.

We support designation of other WSAs as Outstanding Natural Areas, as proposed by the BLM.

Finally, with about five million acres of public lands in northwestern Colorado (1.8 million acres in the Little Snake Resource Area alone), there should be ample country to allow reasonable oil and gas, as well as coal, and other mineral

exploration and development without invading and destroying the wilderness and wildlife values of the small Cross Mountain and West Cold Springs WSAs. No designated wilderness now exists in this entire region beyond the Flat Tops. Only the three aforementioned WSAs and part of Dinosaur provide opportunities to recommend and establish wilderness in the region for the use and enjoyment of the citizens of northern Colorado and many non-resident visitors.

If the Little Snake Resource Area officials truly believe in multiple-use management, which gives equal consideration to all natural resources, a firm wilderness recommendation from the BLM of some 67,000 acres for the three previously mentioned WSAs and a wild and scenic study recommendation for the Yampa River between Dinosaur National Monument and Craig are surely not too much to expect. They are the minimum--and essential.

We look forward to reviewing a final Plan much improved in these respects.

Thank you for the opportunity to present these comments.

# FORT LEWIS COLLEGE

GRAND CANYON, ARIZONA

March 21, 1986

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

Dear Mr. Pulford:

I would like to echo the opposition I am sure you have received re your recommendation that the Cross Mountain WSA not receive wilderness designation.

61-1 Your action is short-sighted to say the least. I have visited this area many times, both on foot and by rail. The area is perfect for wilderness status - in terms of not being disturbed, the scenery, wildlife and recreational opportunities.

I hope you will reconsider your recommendation.

Sincerely,

*John M. Ritchey*

John M. Ritchey  
Professor of Chemistry

JMR/lab

March 19, 1986

Dear Mr. Pulford

I'm not surprised, but not disappointed in the Little Snake RA wilderness recommendations. How much did their RMP cost our taxpayers, anyway? How much of it was written by ranchers and miners?

I'm not saying it's easy to be a responsible steward of our remaining wild public lands, with the continuing clamor for recreation, extraction, development and experimentation. I know that the way things have been done and it would take some guts to stand up to the ranchers who want to keep up the frontier tradition of clearing the land for a buck.

But when you consider that we have a responsibility to the land and to the wildlife, to keep it healthy so that it will live on, then you might see that it's time to change some old ways. For now the main thing the

BLM can do is to protect what remains of the national land.

62-1 (1) West Cold Springs should be a 45,000 acre wilderness, divided by protected areas on either side. Below is Little Snake. Beaver Creek and the spring above it should be protected from the kind of logging that is going on there. The landscape should have the use of that canyon!

(2) Cross Mountain - there is a big dam on a lot of people are mad at the immaturity of the RMP - enough said! Don't fight.

62-2 (3) Evaluate (and recommend) Little Snake Canyon for wild + scenic.

I realize you don't have the mandate to do any real re-orientation really. Wilderness protection at this time - but at least hold the line. Change the wilderness review process.

Yours truly,  
David Lewis  
DAVID LEWIS  
PEX 241  
Boulder 80506

1329 East 11th Avenue #12  
Denver, Colorado 80218

March 22, 1985

Mr. William J. Pulford  
District Manager  
Craik District Office  
U.S. Bureau of Land Management  
455 Emerson Street  
Craik, Colorado 81625

Dear Mr. Pulford:

I am submitting these comments on the Draft Little Snake Resource Management Plan for the record and for your review and consideration. My views are based in part on four years of temporary employment with BLM in Utah and Colorado at Resource Area and State Office levels of the agency. During this time, I won a BLM Project EXCEL grant and a Special Achievement Award from Colorado's BLM State Director.

I believe in BLM and the multiple use philosophy it espouses, but I also believe that wilderness is an integral component of the multiple use concept. I do not believe this latter position is embraced by BLM. Rather, I find two disturbing trends in BLM's official wilderness review process: 1) a failure to consider public comments in establishing wilderness areas, and 2) a preference of in-house administrative land use controls over legislatively implemented controls implied by Congressional wilderness designation.

I view BLM's anti-wilderness bias as a statewide problem, rather than something confined merely to the Little Snake planning area. To support this argument, I evaluate below the BLM's San Juan/San Miguel RMP, prepared in 1984 for public lands in southwest Colorado. I will focus on BLM's treatment of public comments and preference for administrative land use controls. I fear a similar trend is now afoot in the northwest corner of the state, as evidenced by BLM's Draft Little Snake RMP.

In analyzing the 124 written public comments submitted on the Draft San Juan/San Miguel RMP, of those that mentioned wilderness, a clear 2:1 majority called for increased wilderness acreage. This included a number of land owners in the vicinity of wilderness study areas. Specifically, 57 letters were pro-wilderness or supported the "resource conservation alternative," and 28 letters were anti-wilderness, supporting the "resource utilization alternative." The remaining 39 letters did not identify wilderness as an issue. Supporters of increased wilderness acreage included the National Park Service (comment #106), the U.S. Environmental Protection Agency (comment #112), and the Colorado Department of Natural Resources (comment #115). Public meetings held in Durango on June 23, 1984 and in Cortes on June 25, 1984 were overwhelmingly in favor of increased wilderness designations.

Little Snake RMP Comments  
Page three

63-1 Looking closer at Cross Mountain, BLM has proposed an "innovative" ACEC and special ration management area, the aggregate of which closely approximates the WSA boundaries and acreage. As I understand it, the ACEC would be closed to mineral entry and the special recreation management area would be subject to "no surface occupancy" stipulations. This being the case, would it not be wiser to designate Cross Mountain as suitable for wilderness? On the surface, such designation would create no greater development conflicts than BLM's "preferred alternative."

Given BLM's past trends, however, it is doubtful the agency will reconsider its current management recommendations for Cross Mountain. Rather, BLM will likely "interpret" overwhelming pro-wilderness public comment as an endorsement of its administrative designations, similar to its use of public comments two years ago in southwest Colorado.

But unlike a Congressional wilderness designation, the administrative withdrawal of Cross Mountain will neither protect nor enhance the area's fragile resources. When oil and gas development once again becomes profitable, or when water interests decide to build a dam in Cross Mountain Canyon, BLM will be pressured to remove the administrative protections, allowing leases on Cross Mountain to be developed or the dam to be built. BLM will remove the administrative protections with little public notice and certainly will not have to ask Congress for permission to do so.

63-1 And what of the West Cold Spring WSA? In its Wilderness Technical Supplement, BLM ranks three priority management issues: 1) wildlife, 2) recreation, and 3) livestock. Wilderness designation would enhance the first two primary uses, and would not prohibit the third. Although there may be a reduction of AUM's as a result of wilderness designation, this would likely increase rangeland vigor, thus benefiting wildlife and the remaining domestic stock. Of course, with 34% of the WSA under pending oil and gas lease, and 27% currently leased for oil and gas, one wonders what the priority management issue really is for the West Cold Spring WSA? Could there be a "higher use" not necessarily benefiting wildlife, recreation or livestock?

The following statements are found in the Wilderness Technical Supplement, suggesting perhaps that BLM ignored its own analysis when finding West Cold Spring unsuitable for wilderness designation.

"Beaver Creek is unique in northwest Colorado because it is the only perennial stream with public access, that supports a cutthroat trout population. It is also a critical habitat for bighorn sheep and the WSA is within a Colorado Division of Wildlife Quality Elk Management Area."

Little Snake RMP Comments  
Page two

The majority public view expressed dismay that only one of eight WSAs -- the Dolores River Canyon -- was recommended by BLM as suitable for wilderness in the Draft RMP. Did public comment change anything? No. The final San Juan/San Miguel RMP still proposed only a single wilderness unit for the southwest corner of Colorado. The remaining seven WSAs are not intended to receive Congressional scrutiny or wilderness designation.

So how did BLM effectively deflect this public comment without creating the appearance of doing so? BLM promulgated a large number of "innovative" special emphasis and special management areas, all of which were administrative in nature. Hence the Weber and Weminica Mountain WSAs, while declared unsuitable for wilderness by BLM, were subjected to "no surface occupancy" leasing stipulations and closed to off-road vehicles. Squaw, Papoose and Cross Canyons have also been designated as "no surface occupancy" leasing zones and closed to ORV's, ostensibly because of fragile archaeological resources. However, they are also WSAs, albeit declared as unsuitable for inclusion in the National Wilderness Preservation System.

The problem with such administrative withdrawals is that BLM can remove protection stipulations and allow conflicting uses, simply by publishing notice in the little-read Federal Register. Such is not the case with designated wilderness, which can be established only by Congress, and within which, land use actions are strictly defined by law until Congress decides otherwise. And so far, Congress has shown aversion to returning established wilderness to multiple use.

Herein lies BLM's fundamental opposition to wilderness -- the legislation establishing wilderness severely restricts the agency's control of public lands. Through "innovative" administrative withdrawals of WSAs (yet declaring them as unsuitable for official wilderness designation), BLM can placate many pro-wilderness advocates, yet keep all future management options within the hands of the agency. I strongly believe that BLM's strategy violates the intent of the 1964 Wilderness Act and the 1976 Federal Land Policy Management Act.

Now we are witness to this same strategy in BLM's Draft Little Snake RMP, where once again, only one of eight wilderness study areas -- Diamond Breaks -- is recommended as suitable by the agency. Where in BLM's supposed professional impartiality? In its own Wilderness Technical Supplement, BLM states that West Cold Spring and Cross Mountain qualify for wilderness on the key criterion of size, naturalness, and outstanding opportunities for primitive and unconfined recreation. Yet both are seen as unsuitable for inclusion in the National Wilderness Preservation System.

63-1

Little Snake RMP Comments  
Page four

63-1 "Adverse impacts on diversity, geographic distribution, and providing wilderness opportunities within a day's drive of major metropolitan areas would also occur due to loss of wilderness values. These losses would be significant and irretrievable within the region because these ecosystems (pinon-juniper woodland/sagebrush steppe) are not well represented in the National Wilderness Preservation System."

Given that a reasonable interpretation of BLM's draft planning document supports wilderness, the agency should reconsider its decision declaring West Cold Spring as unsuitable for wilderness.

In summary, I believe that BLM is ignoring its own analysis of the Little Snake WSAs, and has unjustifiably declared Cross Mountain and West Cold Spring as unsuitable for wilderness. By BLM's own admission, these two areas more than meet objective wilderness criteria. But to redesignate these two areas as suitable for wilderness could result in an additional 28,000 acres where Congress, rather than BLM, would determine future land use actions. BLM's apparent "preferred alternative" is to manage its land without Congressional intervention.

BLM has to change this unspoken philosophy of opposition to legislative controls of specific areas of public lands. BLM merely chafes public will by declaring a WSA as unsuitable, and then proceeds to administratively protect the same area through "innovative" ACEC's or withdrawals for recreational or wildlife purposes. BLM is at fault when it ignores pro-wilderness public comment, or "interprets" such comment as supporting its policy of administrative land actions. This strategy opens the agency to public criticism, and perhaps eventually, to the negative scrutiny of the Courts and the Congress.

Sincerely,

*William R. Hance*  
William R. Hance



William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

Dear Mr. Pulford,

Thanks for the opportunity to comment on the Little Snake Resource Management Plan. Although I now live in Wyoming, I spent eight years in Colorado and have visited much of the Resource Area.

Since leaving Colorado I have never written a letter to an agency about a land use plan - until now. After reviewing this one, I felt compelled to write because the plan is so clearly biased toward development.

The most egregious decision you made was to recommend against wilderness for Cross Mountain. When I hiked through the area I had no doubt it was a superb wilderness. Of course that may be one man's opinion, but let's get serious - these decisions aren't objective decisions anyway. These decisions reflect personal biases. I'm not saying there is anything inherently wrong with this since we are all humans with our own individual prejudices, beliefs, and aspirations. I'm just saying we shouldn't kid ourselves as to the objectivity of wilderness decisions.

64-1 Cross Mountain is an area which I believe the majority of Americans would agree has high wilderness qualities. Which leads me to wonder how many of the BLM employees in your office have visited the area. Please provide me with a list of those people. Furthermore, of those people who have visited the area, how many of them personally feel it should be designated wilderness? Please give me a count. Be sure to involve everyone in this decision - from the clerks on up.

As for the oil and gas resources in the area that's where my biases show. I happen to think that with almost 1.9 million acres of federal oil and gas acreage in the vicinity, setting aside 14,000 acres is a very reasonable request. I guess you don't feel the same way.

Let me also make clear that administrative protections are not good enough. Such designations are generally used as an excuse to avoid a wilderness recommendation. There are cases where such designations are called for - but not in this area or any of the other WSAs in the Resource Area. If

64-1 you truly want to protect an area then use the best tool you got - wilderness.

I will let others more eloquently and more completely cover the other issues, but for the record I support wilderness recommendations for Cold Springs Mountain and the Dinosaur Adjacent Areas. I thank you for seeing your way clear to recommend Diamond Breaks for wilderness and for recommending protection status for Indian Canyon and Limestone Ridge. In addition Little Yampa Canyon should be evaluated for its potential as a wild and scenic river and grazing impacts should be reduced immediately on areas that are in

64-2 unsatisfactory condition.

Thank you for reading this and I look forward to hearing your response.

Sincerely yours,

*Larry Mohlman*  
Larry Mohlman  
1925 W. 5th  
Sheridan WY 82801

3/14/85  
2212 Mapleton Ave  
Boulder, CO, 80302

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, CO, 81625

Dear Mr. Pulford,

It has come to my attention that the in the management plan for the Little Snake Resource Area, several prime areas were not recommended for wilderness protection. Of the areas excluded, the recommendation against Cross Mountain WSA surprised me the most. This area, adjacent to the Yampa River is a jewel of the BLM landholdings in Colorado. Aside from its undisputable beauty, the area is an important refuge for bighorn sheep, antelope, elk, and mule deer, as well as a critical habitat for the endangered Colorado squawfish, humpback chub and the threatened razorback sucker. The Yampa/Cross Mountain gorge also provides nesting habitat for bald eagles, and peregrine falcons.

65-1 It seems to me that it is far more important to Colorado as a state known for its spectacular wild areas to preserve its places of beauty and the wildlife therein, than to designate more lands for oil and gas leasing, especially in light of the fact that more than 1,875,000 acres of BLM land are already leased for oil and gas development in the near by vicinity.

65-2 I would also like to see the Yampa designated as a Wild and Scenic River under the 1968 Act. This river is one of the foremost whitewater kayaking runs in the state, and the economic advantage from river runners seeking these last few stretches will continue to grow long after any income from oil or gas leasing had expired.

I urge you to reconsider your plans for Cross Mountain, Cold Springs Mt., Vale of Tears, and the other Dinosaur Adjacent areas, as well as the Yampa River, and have the foresight to support Colorado's renewable resources, the unparalleled beauty of our state, rather than some short term, private interest groups profit.

Thank you for your time in considering this comment.

Sincerely,

*Laurie Thayer*  
Laurie Thayer

7600 Arapahoe Rd.  
Suite 111  
Englewood, CO 80112



William Pulford  
Bureau of Land Management  
455 Emerson  
Craig, CO 81625

3/28/86

Dear Mr. Pulford,

This letter is to express the concerns of the Colorado River Outfitters Association (CROA) on the Wilderness Technical Supplement to the Little Snake RMP. CROA is particularly interested in the WSA's around Dinosaur National Monument because of the potential effects on the rafting outfitters operating there. Cross the WSA certainly qualifies for wilderness designation. This area had unique nature resource and recreational features. It is rafted during the lower water season of July-August. Why have you recommended against designation? There has been extensive exploration for oil and gas since the 1960's in this area and there are still no known reserves. This is a poor excuse for non-inclusion. This area is more threatened by development than many areas in the 215. It needs wilderness protection.

66-1 Diamond Breaks WSA both qualifies in terms of naturalness the expansion of natural systems. It would add protection to nearby Ludore Canyon.

CROA also disagrees with your assessment that Ant Hole, Peterson Draw, Teepee Draw and especially Vale of Tears WSA's lack outstanding wilderness values or add protection to the values of Dinosaur National Monument. Vale of Tears is used for side canyon hikes by commercial rafting groups because of its varied geology and historic past. This area has a greater diversity of geology (21 formations by your count) and wildlife than any area you are considering, yet this is not enough in your judgement. It will especially aid to the protection of the lower Vale of Tears watershed within DNM. I urge you to reconsider and seek wilderness status.

CROA appreciates this opportunity to comment and would like to request these comments become part of the public record.

Sincerely,  
*Pat O'Brien*  
Pat O'Brien  
For Tierney,  
CROA Conservation Chairman

## 67

March 28, 1949

1. The "big" 100 does not need to be a percentage, such as priority of 10 percent or otherwise for two reasons. One being that even in the 100 of 10 percent of the 100, it is 10 percent. Two, having said in the priority document that that was not a "big" percentage, it is like, "100 percent."

## 67

(3)

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 2

Herald E. Cabernell

WORLD L. GUYARD

## 67

(2)

The DOW should be held accountable for the numbers of wildlife that are on public land. If the numbers are too high a larger number of permits or post seasons should be required to harvest the wildlife down to acceptable numbers. The DOW should have to pay AUM's the same as permittees do. If not then the wildlife will not be cut because of large numbers of wildlife.

2-3/1-66

## 68

Jeff Miller

69

12660 East 2nd Ave.  
Aurora, CO 80011

April 1, 1986

Mr. William J. Pulford  
Craig District Manager  
Bureau of Land Management  
Craig, CO 81625

Dear Mr. Pulford:

69-1 Dig and Dream Garden Club, Aurora, CO, supports wilderness designation for Cross Mountain wilderness and the 14,081 acres it encompasses. Cross Mountain, from an ecological standpoint, provides crucial habitat for many threatened and endangered wildlife species. The rationale to open the land for oil and gas exploration ignores the world-wide oil glut. Therefore, we urge the Bureau of Land Management to preserve a priceless wilderness, Cross Mountain, as a legacy to Colorado to be enjoyed for generations.

Very truly yours,

*Stella Marker*  
Stella Marker  
Conservation Chair  
Dig and Dream Garden Club  
Colorado Federation of Garden Clubs, Inc.

70

April 4, 1986

From: Frances W. Brown  
P.O. Box 174  
Nederland, CO 80561To: William J. Pulford  
Craig District Manager  
Bureau of Land Management  
435 Emerson St.  
Craig, Colorado 81625

Dear Mr. Pulford:

I sincerely hope that at this date the BLM's rejected plan for Northwest Colorado, and, specifically, the Cross Mountain Wilderness Area, has been seriously re-considered and changes in your recommendations have been made.

I am sure the Bureau is fully aware of the unique beauty and the diverseness in the wildlife, topography and a wilderness experience quite unparalleled in this part of the Colorado-Skyway corridor - western corner.

70-1 New for oil and gas this particular resource is very remote. Supplies of this fuel are, again, plentiful and cheaper due to conservation and good common sense. But now Americans are already sitting back into the attitude of "use it up - there's lots more coming in." Concerning its use is going to become a big joke.

The Wilderness Society acknowledges, with gratitude, the Bureau's recommendations for the Diamond Breaks and the Irish Canyon areas.

However, was the Bureau established solely in order to control and develop the Colorado in all the public lands, irrespective of the wilderness Act and the administrative power is not supposed to have in preserving innocent and irreplaceable sections of wilderness? I think not, it - you and I - are all a part of this land and yardline of what can never be replaced. Don't allow ourselves to become totally absorbed in order to make a more impressive record to a government that is paranoid in relation to energy, power and defense.

Remember your commitment to a quality of life for future generations that only nature has provided over these millions of years.

Sincerely,  
Frances W. Brown  
(Mrs. Frances W. Brown)

71

MICHAEL K. WHITAKER  
P. O. BOX 673  
UNION RIDGE, COLORADO 80834

April 3, 1986

Dear Mr. Pulford:

71-1 I am writing to you to request that your department carefully review and study the Little Vampat Canyon for its potential wild and scenic river attributes.

71-2 I would also like to see BLM review its livestock grazing policy. Many areas are in unsatisfactory condition. I would like to see a cutback in grazing.

Thank you.

Michael K. Whitaker

72

806 E. 7th St. SA  
NY NY 10011  
3-30-86

Dear Mr. Pulford,

I spend a lot of time in the Rockies, & am very interested in management of these wilderness.

72-1 I believe that Cross Mountain would best be managed as wilderness rather than as a recreation management area. As you know, the latter type of designation is not nearly as stable as a wilderness designation.

I would also like to see Little Springs Mtn & the 5 "omitted" areas adjacent to Binsaman Nat'l Monument recommended for wilderness status. Sincerely,

Del Greco

William Pulford  
Bureau of Land Management  
455 Emerson  
Craig, CO 81625

3/28/86

Dear Mr. Pulford,

I am writing in regards to the BLM Wilderness Study Area surrounding Dinosaur National Monument. I am upset that the BLM has eliminated Cross Mtn WSA from consideration for wilderness. I have rafted this canyon, hiked it and know first hand that it qualifies for wilderness. The only reason I can see that BLM has dropped it is because you have caved into pressure by water development interests who want to dam the Yampa in this area. Oil development conflicts are just a front you came up with to hide the real water development issue. Management of public lands requires a balanced approach, but it is obvious that you give more weight to water development than any other resource parameter. At least you could be honest with the public.

I would like to see these comments included in the public record. Thanks for this opportunity to comment.

Sincerely,

Thomas Patrick  
504 S. Whitcomb  
Ft Collins, CO 80521

April 4, 1986

District Manager BLM  
Craig District Office  
455 Emerson Street  
Craig, CO 81625

Sirs:

My name is Philip Ellgen, Box 25, Maybell, CO 81640 and I represent the Urie Ranch South of Maybell, using the Deception Creek allotment.

WSA comment

I agree with the BLM assessment. Cross Mt., West Cold Spring and the rest should not be made wilderness areas. I also think Diamond Breaks should not be a wilderness area. I have several reasons why I believe this, which I won't go into.

RMP/EIS

1. For years I've been around the multiple use principle and I think it works fairly well, probably better than any other system that will be devised. Millions are being spent on studies. Most of them, I believe, are unnecessary and wasteful.

2. The Priority area designations seem to me to be unnecessary and an exercise in futility. I went through the RMP/EIS and if the whole thing cost only ten thousand dollars, the tax payers got copped. It is a mass of error, confusion and disagreement that will keep the environmentalists, lawyers and bureaucrats, not to mention the users and everyone else, arguing and wasting public money and resources for generations to come.

3. In the area of this ranch the BLM land is in small to medium-sized parcels, dispersed in the midst of deeded land. This creates many problems, too many to cover all of them here. Some can be lived with, others will always be a pain and some changes should be made. My solution would be to sell some of these parcels at the going price of similar land or do some trading. Others would be expensive or impractical, like building fences and developing water. This ground in most cases is what wasn't taken up by homesteaders and is generally poorer land - the driest, least accessible etc..

In regard to the wildlife, mostly antelope and deer, the departments concerned, dogooders and tourist-hunters would like everyone to believe that this game spend their lives on this BLM land and never leave it. Believe me when I say they don't! They spend 95% of their lives where the water and better feed is - private land. We are accused of being subsidized in our use of BLM land. Would anyone like to have the equivalent of a band of 2000 sheep on their land eating their grass and drinking the ponds dry with no recourse, and then be expected to let everyone have free access to hunt, shoot up the windmills, cut fences, drive over gates, etc.? But in drawings and poor management our herd of antelope is allowed to multiply beyond all reason, more than 1/3 are bucks that will never be harvested. Deer bucks are shot to near extinction each fall. Two winters ago 2000+ antelope winter-killed on this ranch (what a waste), it helped us however temporarily, but due to available water and good living conditions they migrate in every fall and we now have over 1000 head again.

4. As for the management of BLM lands, I believe it should be done by boards made up of local, elected, interested parties and representatives of national interests. It's been proven to me many times that well-educated and good-intentioned, but inexperienced outsiders cannot manage these lands. When we get a good man, it isn't long until he is moved and we get inexperience and confusion again. I believe we soon won't be able to afford the system the way it's headed. More wilderness areas aren't the answer.

Page 2

wer. With good multiple-use management we could find the answers to most problems and get full utility out of our public lands.

5. Finally, I disagree with all of the studies and other expenses that are engaged in for information, that, in a lot of cases, is in error or irrelevant, or so basic it seems silly to keep bringing it up. Even after facts are established, no matter how simple, they are buried under a blizzard of words and paper. The more I read the two studies, the madder I get at the waste and uselessness of it all.

I hope these comments will be helpful and of some use in the decisions that are made.

Sincerely,

Philip E. Ellgen

10473 Horizon View Drive  
Horizon, CO 80465  
April 4, 1986

Mr. W. J. Pulford  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

Dear Mr. Pulford,

I'm writing to express my support for the designation of Cross Mountain, West Cold Springs Mountain, and the tracts adjacent to Dinosaur National Monument as wilderness areas.

I started this letter with the intention of giving you a long list of reasons for my position, but I'm sure you've already heard (ad nauseam!) all of those reasons. I'm equally sure that I haven't heard all of BLM's reasons for its recommendations in the Little Snake RMP. Your organization is at the focus of an intensifying storm of controversy over priorities for wild lands, and I'm sure that it's a most uncomfortable place to be. So, instead of arguing, let me express my appreciation for your work, and my gratitude for your willingness to be on the hot seat.

Thanks,

Jim Durham

76

1700 N. Lake  
Fort Collins, Co 80521  
April 3, 1986

Bureau of Land Management  
Craig District Office  
455 Emerson St.  
Craig, Co 81625

Dear Sir:

I am writing to express my support for the "preferred alternative" in the draft Resource Management Plan for the Little Snake Resource Area which proposes Special Management Area designation for the following four areas:

Limestone Ridge  
Cross Mountain Canyon  
Irish Canyon  
Lookout Mountain

It is gratifying to know that our land managers are making efforts to protect such scenic and biologically important areas while we still have the chance. The rare and unique flora in such locations need that type of protection to survive and reproduce.

Sincerely,

*Gary L. Thor*  
Gary L. Thor  
Researcher,  
CSU Agronomy Dept.

77

06 April 1986

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

Subject: Little Snake Resource Area Resource Management Plan

Dear Mr. Pulford,

A review of the Little Snake RMP clearly shows a disproportionate emphasis on mineral extraction and resource exploitation. You have subverted the concept of "multiple use." I do not see potential for stone, significant oil, gas, and mineral value in Little Snake. And, I do see outstanding wilderness qualities for this area.

77-1 While I commend BLM for recommending Diamond Breaks as suitable for wilderness designation, I am distressed that BLM has not recommended the seven remaining wilderness study areas. I believe that these areas readily qualify as wilderness, and I do not believe that the recreation management area status provides adequate protection for them. I urge you to recommend West Cold Springs, Cross Mountain, Ant Hills, Chew Winter Camp, Peterson Draw, Tape Draw and Vale of Tears as suitable for wilderness designation in the Little Snake RMP.

Scenic, recreational, wildlife, and cultural values are found throughout these areas, while oil, gas, and mineral values appear of marginal consequence. Additionally, livestock grazing is an inappropriate activity for these areas due to the poor or unknown condition of the range. The wilderness values of these areas are irreplaceable and must be preserved.

77-2 You must also evaluate the wild and scenic attributes of the Little Yampa River between Craig and Maybell. On basis of this evaluation from the RMP, further indication that the document is nothing more than a blueprint for mineral development in northwest Colorado. I believe the Little Yampa is worthy of protection under the Wild and Scenic Rivers Act.

77-3 Finally, I urge you to reduce livestock grazing. Ninety-seven percent of federal lands in Little Snake are authorized for grazing in the RMP, while one third of the range is in poor condition and another third is in unknown condition. Livestock ranching is not a profitable enterprise in the arid regions of the West, the range cannot and never will support enough livestock. The carrying capacity for livestock on these lands has been measured inaccurately, resulting in severe erosion and water quality problems which are likely to persist under present RMP allocations. To save these lands for a handful of welfare ranchers is untenable. The last wild remnants of beautiful Colorado must be preserved and protected forever.

I appreciate this opportunity to participate in the BLM commentary process.

Sincerely,

*Tony Horton*  
Tony Horton  
Box 261112, Lakewood, CO 80226-1112

78

DEAR MR. PULFORD,

78-1 I URGE YOU TO RECONSIDER THE DECISION NOT TO INCLUDE CROSS MOUNTAIN AS A WILDERNESS AREA. THE MOTIVES OF THE BLM ARE CLEAR; DESTROY & DEVELOP NO MATTER WHAT THE COST TO THE OUTDOOR'S USER. I DISAGREE WITH YOUR DECISION & HOPE IT IS NOT TYPICAL OF OTHER RECOMMENDED RECOMMENDATIONS YOU WILL MAKE. ALL CITIZENS ARE INTERESTED TO PUBLIC LANDS! *Ruth M. Robinson*

79

1030 Hemlock Way  
Broomfield, Colorado 80020  
April 8, 1986

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, Colorado 81625

Dear Sir:

The Bureau of Land Management's Resource Management Plan for the Little Snake Resource Area is, in total, a disappointment. The inclusion of Diamond Breaks, Irish Canyon, Limestone Ridge and a total of 91,000 acres for wilderness study is certainly a plus, but the exclusion of Cross Mountain, Cold Springs Mountain, the Dinosaur Adjacent Areas and the Little Yampa Canyon greatly diminishes the overall value of the plan.

79-1 When one takes the long term perspective, the value of such places as Cross Mountain and Cold Springs Mountain for wildlife habitat, conservation of ecological diversity, and outdoor recreation far outweigh the immediate one-time value of potential mineral exploitation and the longer-term value of grazing. Frankly, it is difficult to understand why an agency charged with the stewardship of so much public land fails to reach this conclusion, especially when we are talking about less than 1% of the total land area the plan covers. I believe you should revise the plan and include the areas mentioned above in your recommendation.

This is the only chance we will have to protect these unique areas. Please show a little vision and do something present and future generations will thank you for.

I appreciate the opportunity to comment on your Resource Management Plan.

Sincerely,

*Joe Krieg*  
Joseph J. Krieg

Dr. William J. Sullivan  
 Group Executive Manager  
 Financial 1993 International  
 400 Madison Avenue  
 10022, Columbia Blvd.

2. *Interpretation of the results*

[illegible]

Of the very few documented uses out of the eight weapons, only one was recommended for the "darkness" designation. This seems to be totally contrary to the spirit of multiple use designation. Allowing areas to remain open to early exploration insures that that those areas will be studied for a wide variety of activities, both commercial and noncommercial.

Finally, the recreation management area designation is totally inadequate and does not live up to its title. The fact that even this designation can be easily revoked, leaving an area wide open to energy development, in reality, it gives recreation a very low priority.

Thank you for supporting Diamond Breaks while as a wilderness area but please, please, please reconsider the other seven recommendations and know that once the decision has been made to allow development, these areas and their wildlife will never fully recover.

Enclosed:

S. J. Cherkhman

1. 7. 2008

82

April 3, 1986

8405 E Hampden #8C  
Denver, CO 80231

William J. Pelford  
Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

Dear Mr. Pulford,

Regarding your Little Snake Reservoir Area Resource Management Plan I would like to offer the following opinions:

82-1 Cross Mountain - I feel it should be recommended for wilderness designation. After a 3 day backpack there last spring I was quite impressed with many aspects of the area. The gorge is very impressive, wildflowers numerous and colorful, wildlife plentiful including antelope and deer, great vistas and solitude. It is a great place to go early in the season when the snows are still too deep high in the mountains.

Diamond Breaks - Diamond Breaks is equally deserving of wilderness designation and maybe more so. Thank you for recommending Diamond Breaks as suitable for wilderness designation.

One overall comment I have is it seems that the BLM allows too much livestock grazing or overgrazing on some lands. Hopefully livestock reductions will be recommended by the BLM.

Sincerely,

Bruce M. Stevens

April 3, 1986

Dear Sirs

After reviewing the Little Snake Resource Area Management Plan and the Wilderness Technical Supplement, we are in complete disagreement with your decision of not recommending the Cross Mountain area for study Area (WSA) for wilderness designation. The Yampa River is the last free flowing river in the whole Colorado River drainage. The Colorado River system is one of the most controlled (damed) in the U.S.A. Even with the extensive flood control systems. In 1993 flooding occurred along the lower Colorado River because of the release of water from the dams. The flood was not controlled at levels until the last minute. We do not need another dam on the Yampa. Wilderness designation for the Cross Mountain WSA will help assure the Yampa's future as a free flowing river.

81-1 It is the BLM's responsibility to protect the semi-arid lands under its control. Livestock grazing in the seven WSA's, which were not recommended for wilderness protection, will only promote erosion and deterioration of the range. Overgrazing has already damaged much of the range land in the Little Snake Resource Area. Why continue to destroy the range which is necessary for both domestic stock and wildlife.

This is the last chance to set aside, for all generations, a very small area of BLM lands. We should not cater to special interest groups and their lobbies in the name of the slightest dollar. It is less than 4% of the land managed by the BLM in the Little Snake Resource Area too much to ask for wilderness recreation? All eight WSA's in the Resource Area should be recommended for wilderness designation.

Sincerely,

Robert and Thelma Tubbs Sr.

Robert E. Tubbs Esq.  
Spelman Tubbs

March 31, 1986

Bureau of Land Management  
Craig District Office  
455 Emerson Street  
Craig, CO 81625

Subject: Comments on the Little Snake RMP and FIS

Mr. Pultord:

After reviewing the Little Snake RMP and EIS, I urge you to change the Preferred Alternative to the Natural Environment Alternative for the following reasons:

1. The 90,887 acres suitable for wilderness in the Natural Environment Alternative represent only 7% of the 1.3 million acres that you manage. If any less than that amount is recommended it would constitute a discrimination against the wilderness resource.

2. I support the reduced extraction of consumptive resources such as grazing, timber cutting, and minerals proposed in the Natural Environment Action Plan. I am alarmed at the increase in air and water pollution that is a result of the intensification of resource extraction from our public lands. The threat to wildlife and humans is being threatened by this pollution and the most reasonable way to reduce this threat is by slowing down the extraction of resources.

Sincerely,

Daryl Underst  
1620 So. Clayton  
Denver, CO 80210

April 12, 1986 **84**

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson St.  
Craig, Colorado 81625

Dear Mr. Pulford:

I am not familiar with the northwestern part of Colorado included in the BLM Little Snake Resource Area Resource Management Plan which would establish management policy for minerals, grazing, wildlife and wilderness for the next 10 - 15 years.

Proposals for Wilderness Status for Diamond Breaks, for Area of Critical and Environmental Concern for Irish Canyon, and Research Natural Area for Limestone Ridge are to be commended.

However, from what I have read of the lands included in the Plan, I believe protection of such other wild and scenic areas as Cross Mountain, Cold Springs Mountain, five parcels of land adjacent to Dinosaur National Monument, and Little Yampa Canyon are woefully inadequate.

84-1 The Cross Mountain area should not be subjected to oil and gas exploration. Three dry wells have already been drilled there. The area is less than one percent of the total 1,876,000 acres of federal oil and gas lands in the vicinity. The Cross Mountain oil and gas potential is extremely questionable and no excuse for the destruction of this irreplaceable wilderness.

Cold Spring Mountain is precious for its wildlife, and the BLM analysis admits that its management plan for oil and gas and livestock would be devastating to the wildlife.

The five small areas adjacent to Dinosaur National Monument are of wilderness quality and should naturally be added as extensions of the Monument's boundaries.

The National Park Service considers the Yampa River between Craig and Maybell to be worthy of National Scenic River protection. Little Yampa Canyon should be an Outstanding Natural Area instead of the site for Juniper Reservoir which would ruin the Yampa River forever.

Moreover, BLM acknowledges the problem of overgrazing on 1/3 of the lands in its management area, with another 1/3 in "condition unknown", yet it continues to allow overgrazing.

For these reasons, I believe that the Bureau of Land Management should reconsider its recommendations for management of its lands in northwestern Colorado. The most valuable assets of this State - scenic beauty, wilderness and wildlife - are rapidly being destroyed. Unless we preserve what is left, Colorado's national reputation as a natural haven will be gone and this will be just one more place of smog, congestion, roadcuts, erosion, dams, condominiums, spoilbanks, abandoned trash - a wasteland.

The natural environment is not a passive web of resources to be exploited to death. It is the matrix of our existence. Our survival depends on it. Use it we must, but to destroy it is to ultimately destroy ourselves.

Yours most sincerely,

*Glenn Wolfe Torosian*

Jeanne Wolfe Torosian  
1251 Country Club Drive  
Long's Peak Route  
Estes Park, Colorado 80517

**85**

Ruth Carol Cushman  
1401 Mariposa Avenue, Boulder, Colorado 80302 (303) 442-1636  
April 14, 1986

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson St.  
Craig, CO 81625

Dear Mr. Pulford:

85-1 We are writing to urge you to reconsider your recommendation against wilderness designation for the Cross Mountain Wilderness Study Area. The spectacular scenery plus prime wildlife habitat surely demand wilderness protection for Cross Mountain so we were horrified to learn that BLM has only suggested a designation of "recreation management." Please don't sell out the wilderness for the remote possibility of oil and gas reserves. Also, please include this letter as part of the hearing record, if possible.

Sincerely,

*Ruth Carol Cushman*

Dr. and Mrs. Glenn Cushman

**86**

April 14, 1986

William J. Pulford, Craig District Manager  
Bureau of Land Management  
Craig, Colorado

Sam would be in addition to the BLM's inability to see that I did as much as I could to preserve the wilderness area - the habitat action against Cross Mountain, Cold Springs Mountain, and near areas to Dinosaur National Monument.

I urge you to take a decisive step to change these areas! Be kind - save as much as you can & it won't be any later to save!

86-1 We also seem to have a total lack of ability to think it through with respect to increased use of the supposed oil & gas fields and the ability to maintain the habitat.

Let's be very positive & make a mark that can be preserved by preservation!

tim Pulford

To Whom It May Concern:

87

The Cross Mtn WSA should remain  
Wilderness & should be designated as such.  
87-1 There is no credible reason for non-designation

Sincerely,

John A. Folger  
J. A. Folger  
2340 Locust Street  
Denver, CO 80207

88 7/6

To Whom It May Concern:

I am writing to comment on the  
Little Snake Draft Resource Management Plan.  
Not enough areas are proposed for  
Wilderness Designation. The BLM has  
recommended Diamond Breaks WSA for  
protection; this is good, but insufficient.

The following areas should all be given  
Wilderness Designation:

88-1 CROSS MOUNTAIN: This is an  
incredibly beautiful area, and it's very important  
that it be saved. It's also great  
wildlife habitat. There should not be  
any kind of development of this area.

WEST COLD SPRINGS: This WSA must  
be preserved for its mountain lion habitat.  
That's enough reason by itself, considering  
the scarcity of lions in the state.

88

Also, the five areas immediately next  
to Dinosaur N.M. are important. They  
are logical areas to save because they  
would increase the size of the region protected,  
creating in effect a much larger wilderness.  
Preserve these areas!

88-2 Further, the Little Yampa Canyon needs  
to be preserved. It's a wild area and  
deserves wilderness Designation (or Wild & Scenic  
River Designation, but wilderness would be better in my  
view). Why wasn't this area even studied?  
SAVE IT!

Finally, grazing should be severely restricted  
to stop erosion as well as ecosystem & habitat  
damage, and oil & gas leasing should not be  
allowed. These two steps would help restore the  
quality of wildness to these BLM lands which  
are part of our priceless natural heritage.

Sincerely,

Eric Johnson  
ERIC JOHNSON  
2137 GROVE CIR W  
BOULDER, CO 80502

89

Susan M. Kasprick  
P.O. Box  
Lawrence, KS 66044

William J. Pulford  
Craig District Manager  
455 Emerson St.  
Craig, CO 81625

Dear Sir:

89-1 I understand that the Bureau of Land Management has not  
recommended Cross Mountain for wilderness protection. I  
have heard of the beauty of the Yampa River in the wilderness  
study area, and of the many species of wildlife (some of  
which are endangered), which are naturally supported by  
this habitat. I am an avid mountain climber who deeply  
appreciates and protects the natural environment when I am  
in the backwoods. I hope that you will reconsider including  
Cross Mountain in the draft resource management plan.

I realize that this area may contain gas and oil, which makes  
development desirable for business. However, I believe  
that this area is geologically valuable, is protection for  
many wild animals, and is therefore a primary issue for  
conservationists.

I vote for wilderness protection for this area. Thank you  
for considering my opinion.

Sincerely,

Susan M. Kasprick  
Susan M. Kasprick

90

April 19, 1986

Mr. William J. Pulford, District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, Colorado 81625

89-1 Dear Mr. Pulford: The Bureau's recommending  
Diamond Breaks for wilderness designation  
is certainly commendable. However, it  
is dismaying to learn that Cross Mountain  
and Vale of Tears are not so recommended.  
I strongly urge BLM to reconsider  
and recommend them.

William M. Folger  
Professor William M. Folger  
2340 Locust Street  
Denver 80207



423 1/2 N. Wisconsin  
Gunnison, CO 81230

April 18, 1986

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson St.  
Craig, CO 81625

Dear Mr. Pulford:

I am writing with regards to the draft EIS issued for the Little Snake Resource Area. I am extremely surprised Cross Mountain Wilderness Study Area was not recommended for inclusion into the wilderness system. This area is by far one of the better examples of BLM wilderness. In 1977 I was involved with the University of Colorado Wilderness Study Group, and happened to work in the Little Snake Resource Area. Cross Mountain as a potential wilderness was and still is one of the shining stars. I urge you to reconsider your recommendation on this area. In addition, I commend you on your suitable recommendation for Diamond Breaks as wilderness.

On another note, I agree with your proposed RNA and ACECs-Limestone Ridge and Cross Mountain, Irish Canyon, and Lookout Mountain, respectively. Additionally, I do contend that your preferred alternative should still consider a wilderness recommendation for the Cross Mountain area. In each proposed RNA or ACEC there are either specific plant species or plant associations that require protection. There are four other such areas that require protection; these are Ink Springs, G-Dep, Horse Draw, and Hell's Canyon. Each have either important plant associations or specific plant species (e.g., *Festuca yampsonii* at the Ink Springs area) requiring particular care in management. In addition, Vermillion Bluffs, Ace in the Hole, and Vermillion Creek Falls should have stronger protection other than administrative mandates.

There are many other management alternatives that can be addressed, yet I deem the above mentioned items as most important. Thank you for the opportunity to comment.

Sincerely,  
*John Cudde*  
John Cudde

April 16, 1986

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

Lyle R. Moss D.O.

Family Medicine/Obstetrics

Mr. Pulford,

I am aware of many caves on Cross Mountain. They are a very fragile resource, easily damaged by vandals, both intentional and by those uninformed about conservation measures.

At the February 1985 Cave Management Symposium in Salt Lake (attended by representatives of the BLM from New Mexico), some of the principles of management included keeping entrances at a distance from easy road access. The resultant cave visitors are more likely to have a memorable experience and treat the cave with respect if effort is expended arriving at the entrance. For Cross Mountain caves, maintaining remoteness would help select out visitors who are ill prepared to enter a cave sixteen stories straight down, and exiting as it may seem, unprepared to ascend back up over 150 feet of ropes.

The Wilderness Act was specifically formulated to protect unimpaired areas including all the areas under consideration (Cold Springs Mountain, Diamond Breaks, Dinosaur adjacent areas, hopefully parts of Irish Canyon, and most certainly Cross Mountain). I would urge you to not lose sight of the long term stable resources of recreation over consumptive uses which permanently alter the land for ourselves and future generations.

The enclosed copyrighted map is not intended for general distribution. Its purpose is to help document and protect the resources of the area.

Sincerely,

*Lyle R. Moss*  
Lyle R. Moss, D.O.  
N55 16233 H

LRM/sz  
cc: Editor, Rocky Mountain Caving  
Colorado Cave Survey  
Colorado Environmental Coalition  
Enclosure

Enclosure



MEMORANDUM FOR THE SECRETARY

Memorandum

To: Colorado State Director, BLM

From: Departmental Consulting Archeologist *B. K. K.*

Subject: Review of the Little Snake Resource Management Plan, BLM Craig District, CO

#### What it does

This resource management plan is to provide "overall multiple-use objectives, decision-making criteria, and resource development priorities for the Little Snake Resource Area. It is to be used over the next ten years. The Little Snake area is in the northwest corner of Colorado and comprises about 1/12 of the state. The BLM holds 63% of the land and 74% of the mineral rights.

Despite the generalized protestations, there are immediate plans for coal, oil, and gas development, logging and grazing, etc. In addition, there is a Draft Wilderness Technical Supplement for eight areas adjacent to Dinosaur NM and Browns Park NWR. Seven of these were opened to minerals exploration, and one was recommended for the NWPS.

There are no management plans. To the extent that impacts are identified in particular development projects, the BLM district will conduct CRM according to LR regulations. Under the preferred resource management alternative, the only environmental consequence identified was loss of cultural resources through designation of areas open to off-road vehicles. No provision to mitigate this damage is part of the plan, though these impacts are deemed unavoidable.

There is no management plan. To the extent that impacts are identified in particular development projects, the BLM district will conduct CRM according to LR regulations. Under the preferred resource management alternative, the only environmental consequence identified was loss of cultural resources through designation of areas open to off-road vehicles. No provision to mitigate this damage is part of the plan, though these impacts are deemed unavoidable.

#### How it does it

Apparently there is an automated data base for the Resource Area, but it was only put to use to derive expected numbers of sites with gross areal projections. Two of thousands of sites are thus predicted, but the only discrimination as to habitable surface is to separate uplands from lowlands. None of this information is extracted into useful presentations on historic contexts. There seems to be no awareness of the Secretary's Guidelines relative to the organization of information, description of the results of previous work for planning purposes, and integration of work into a systematic preservation effort. No priorities for treatments are established, and no planning responsibilities (other than general references to CRM programs) for agency personnel are defined.

None of the development programs are discussed as CRM issues. Again, the plan simply presents assurances that individual projects will be in compliance. Areas designated for ORV use are repeatedly cited as the most significant locations for inevitable destruction of sites. There are no plans for inventories of these areas, no plans for monitoring these impacts, and no guidance to managers for dealing with them as unavoidable.

#### What it accomplishes

The plan accomplishes nothing. It is a mere statement of intent. It does not provide any guidance or information that would be useful in managing the Resource Area. It is a mere statement of intent. It does not provide any guidance or information that would be useful in managing the Resource Area. It is a mere statement of intent. It does not provide any guidance or information that would be useful in managing the Resource Area.

The only subdivisions in the Resource Area specifically evaluated for cultural resource potential were those considered for wilderness designation. All the information considered for these evaluations is listed below:

#### Cultural resources in wilderness areas

**West Cold Spring:** no survey; several prehistoric sites; historic site known. Expected occupations--PaleoIndian to Ute/Shoshoni, historic use beginning in the early 1800s.

**Diamond Breaks:** no survey; several prehistoric sites known and historic sites well-known from Browns Park NWR. Expected occupations--ibid.

**Cross Mountain:** no survey; several prehistoric sites known. Expected occupations--PaleoIndian to Ute/Shoshoni.

**Ant Hills:** cultural resources not evaluated.

**Chew Winter Camp:** ibid.

**Peterson Draw:** ibid.

**Tepee Draw:** ibid.

**Vale of Tears:** ibid.

The Diamond Breaks area is to be the only one nominated for wilderness status. The others will be open to development, and there is some provision for designating specific sites as natural preserves.

This resource management plan accomplishes very little. The BLM district appears committed to the same policy, allowing oil and gas drilling in the Diamond Breaks area. The BLM district appears committed to the same policy, allowing oil and gas drilling in the Diamond Breaks area. The BLM district appears committed to the same policy, allowing oil and gas drilling in the Diamond Breaks area.

1615 W. Cheyenne Rd. #10  
Cala Springs, Co. 80706  
April 17, 1986

William J. Rulford, Craig Dist. Mgr.,  
Bureau of Land Management  
455 Emerson St., Craig, Co. 81625

Dear Mr. Rulford,

I would like to comment briefly on a few BLM proposals for WSA's in the Denman National Monument area. First, I commend the recommendation for wilderness status of Diamond Breaks. This would greatly complement the wilderness value of the neighboring National Monument and protect the wildlife and recreational assets of Diamond Breaks. Second, I support the designations respectively of Irish Canyon and Denman Ridge.

- 95-1 The fragile ecosystem as well as the scenic values of these areas should not be sacrificed for the ecological destruction of oil and gas and mineral exploration. I fail to understand the amount of wilderness policy required for these areas like Cross Mountain, Cold Springs Mtn., Denman District areas, Little Yampa Canyon, etc.
- 95-2 The intensive grazing on one third of BLM land considered untenable for this. Why doesn't the BLM evaluate the wild and scenic attributes of the Yampa River between Craig and Maybell? This river is severely threatened by the proposed Juniper Reservoir.
- 95-3 Why must Cross Mtn. and Cold Springs Mtn. be sacrificed when they each comprise less than one percent of the 1,878,000 acres of federal oil and gas acreage in the vicinity? What can be said to justify the loss of the wildlife, vegetation, archaeological sites, scenery, and recreational values in light of the alternatives? I would like to believe in and support the BLM, but more and more I hear of increased policies and negligence in the stewardship of the land.

I would be most interested in hearing from you on your views and plans for these areas. I am curious if you have any concern to protect the dwindling tracts of wilderness that are under constant threat from profit seeking private enterprises.

Sincerely,  
Jim Eiland

April 20, 1986

Little Snake Resource Area  
Bureau of Land Management  
Craig, Colorado

Dear Sirs,

After attending the Public Meeting at the Moffat County Courthouse and being that I'm a man of few words I thought I would also write this short letter since my presentation at the Public Meeting was let's say pretty short. I'm a native of Craig and have for a few years in Wyoming have lived out my 29 years here in Craig. About 3 years ago I started kayaking and I think my interest in Cross Mtn. and Juniper Canyon really got going and these two areas will be my main subjects I would like to concentrate on. I know like everybody else your really busy so I'll keep it short.

First, I would really like to see a little thought in developing the Little Yampa and Juniper Canyon into a usable recreation area. The Little Yampa is a excellent section of the Yampa for canoes and fishermen or someone looking for a relaxing float. And Juniper is a excellent spot for rafting and kayakers. I and several local kayakers run Juniper Canyon many times during the spring sunfish and drive down to a section of the canyon after work and play in the lower rapid until it's to dark to see, sounds great doesn't it? One of the biggest problems we have is access into the canyon it's not so bad when we run the whole canyon but when we go to the lower rapid after work we have to use a private road (which we have permission to use) but it could be closed any time. I think Dave Cooper knows about this problem so if you need any details please see Dave. I think it's a great area and should be given a little more attention.

- 96-1 Will now we come to the really jewel of jewels - Cross Mtn. There's really not much to say here this area has all the qualifications for a Wilderness Area and should be designated one. I can't think of another area with such a varied number of wildlife and the canyon itself is one of the most beautiful I've ever seen any where in the West. I must admit the way it's been designated may work fine but what will keep a big Oil Company from coming in here and tearing the hell out of it? They have no real stake in our community or way of life all these worried about is making a buck, well with the environment! If this area was a Wilderness Area it would be saved from that kind of senseless destruction and be there for future generations. I guess I really want this area to be here just the way it is for my kids and there kids. I really feel fortunate to live here and want to preserve our way of life to put it in a nutshell.

Thanks for letting me put in my two-cents worth and for putting up with my typing.

Sincerely,

Ed Hargrave

P.S. Thanks for the Diamond Breaks Wilderness designation.

Ed Hargrave  
592 State St.  
Craig, Co 81625

Clay Johnson  
P.O. Box 31  
Jensen, UT 84035  
20 April, 1986

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

Dear Mr. Pulford:

I commend you for recommending the Diamond Breaks area for wilderness status, and for your administrative decision to manage Irish Canyon as an ACD.

The Brown's Park area, especially in Utah, is in danger of losing to creeping development the recreational, wildlife winter range, historic and natural values that make it so important to the nation, the state, and most importantly to those of us who have purposefully chosen this area in which to live specifically for such features as the Green River and the Brown's Park area. My feeling is that we need even more land in the Brown's Park area protected from the degradation inevitable with certain types of commercial exploitation. I work in an oil field service shop, so you should realize that I understand both sides of the coin when I take this stand.

97-1

I strongly urge that you also support the inclusion of your Cross Mountain WSA and the small WSAs immediately adjacent to Dinosaur National Monument for wilderness status. It is only too obvious to any thinking person that areas degraded from wilderness or natural status cannot ever fully return to their previous condition in terms of the scale of a human lifetime, but that in case of true national emergency any areas now declared wilderness could all too quickly be exploited for necessary purposes or materials. Since the proposition is entirely one sided, it behooves us to retain as much land as humanly possible in the category that doesn't preclude future choices: wilderness.

I also feel the BLM should be taking a much more active role in supporting the interagency decision made nearly fifteen years ago to acquire Wild and Scenic Rivers status for the Green River from Flaming Gorge through Dinosaur National Monument.

cc:BLM,Vernal

Thank You,  
*[Signature]*



## Sierra Club

Rocky Mountain Chapter  
2339 East Colfax, 7211  
Denver, CO. 80204  
(303) 371-8292

TO PRODUCE, ENVOY, AND IMPROVE THE NATION'S  
FOUNDS, WATERS, WILDLIFE AND WILDERNESSES.

Mark Pinarson  
P.O. Box 204  
Grand Junction, CO  
81507

April 14, 1986

Mr. Bill Pulford  
Bureau of Land Management  
Craig District  
455 Emerson Street  
Craig, CO 81625

Dear Mr. Pulford:

I am taking this opportunity to comment on the Little Snake Resource Management Plan and Environmental Impact Statement on behalf of the Rocky Mountain Chapter of the Sierra Club and the Colorado Environmental Coalition (formerly the Colorado Open Space Council). The Sierra Club is a national conservation organization with 7,000 members in Colorado, many of whom are familiar with the public lands of the Little Snake Resource Area. The Colorado Environmental Coalition is a coalition of civic and environmental groups in Colorado, with a combined membership exceeding 30,000.

I have followed the Little Snake RMP from its inception in 1983, attending the first scoping meeting in Craig and commenting at every opportunity since that time. It is thus with dismay that I have read the Preferred Alternative of the RMP. BLM has largely ignored the many painstaking comments made by conservation groups throughout the course of the RMP's development, and has produced a document heavily slanted toward commodity production such as coal, oil and gas, and livestock.

The Preferred Alternative purports to be a "balancing of conflicts among all the resources" (DEIS at 2-61). It is anything but that. Resource conflicts have been decided in an apparent vacuum, with wilderness, wild rivers, and wildlife losing out to abundant mineral resources in decision after decision. That an area such as Cross Mountain, the epitome of BLM wilderness in Colorado, could be singled out by BLM for "balancing" of oil and gas resources against wilderness resources, in the absence of any consideration by BLM of the relative scarcity of values involved and the millions of acres of other available oil and gas lands, is, quite frankly, appalling.

What follows are comments by specific resource. The Sierra Club and the Colorado Environmental Coalition in general support the Natural Environment Alternative.

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### WILDERNESS

There was a curious comment by District Manager Pulford in the Northwest Colorado Daily News (March 10, 1986) that indicates an unfortunate perception of the wilderness resource and its relation to other resources within BLM. Mr. Pulford is quoted in reference to BLM's wilderness recommendation for Cross Mountain as saying that "We think we can do the things that the Colorado Environmental Coalition wants us to do, but we can hold it open for multiple use too." BLM is implying by this statement that wilderness somehow is not multiple-use. Is BLM aware that Section 4 (a) (1) of the Wilderness Act specifies that wilderness is compatible with the purposes of the Multiple-Use Sustained-Yield Act of 1960? Is it not simply common sense that most of the uses identified in the Multiple-Use Sustained-Yield Act are compatible with, and frequently enhanced by, wilderness designation? Recreation, wildlife, and watershed protection all often benefit from wilderness designation, and livestock grazing is also not incompatible with wilderness. Only timber production is prohibited by wilderness. Would not BLM agree that wilderness obviously is compatible with the precepts of multiple-use? In contrast, livestock grazing, a resource frequently touted by BLM as a wonderful example of multiple-use, is much more of a resource lock-up as it destroys watersheds, competes with wildlife, and generally aggravates recreationists. If BLM wants to talk about single use designations, then let us talk about livestock grazing emphasis areas and not wilderness.

### CROSS MOUNTAIN

By now BLM is undoubtedly aware that many conservationists in Colorado consider Cross Mountain WSA to be one of the premier BLM wilderness candidates in Colorado. It bears repeating that Cross Mountain is unique among potential BLM wilderness lands in Colorado. Nowhere else is such a combination of endangered species, big game animals, diversity of recreational opportunities including such uncommon pursuits as kayaking and spelunking, spectacular scenery, and remarkable geologic landforms brought together in one place. BLM must consider Cross Mountain to be somewhat special since it was singled out for reproduction on the cover of the RMP/EIS document, presumably representing the finest that the Little Snake Resource Area has to offer.

**Administrative Protections** - BLM is offering archaic administrative protections for Cross Mountain in lieu of permanent protection through legislative designation as wilderness. Is BLM aware that the motivation for the Wilderness Act itself came from the failures of administrative protections? Does BLM know that in passing the Wilderness Act, Congress specifically acted to address the inability of administrative protections to preserve wilderness values in the longterm? Several examples should suffice to demonstrate this point.

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BLM offers to pursue a mineral withdrawal for Cross Mountain Canyon as an alternative to real protection through wilderness designation. An administrative withdrawal of the canyon from mineral entry, if actually approved, can easily be revoked at the whim of the Director of the BLM. Recent history reveals the inadequacies of such administrative protection through withdrawal. In the last few years, BLM has revoked the withdrawals of many millions of acres of public lands, for many diverse purposes, without any public notification, without any environmental analysis of the consequences, and without any opportunity for public scrutiny of the action. Only because of a lawsuit filed by the National Wildlife Federation are the revocations being reviewed in a public forum, i.e., federal court. How can BLM claim an administrative protection such as an administrative mineral withdrawal is a suitable alternative to legislative withdrawal through wilderness designation? BLM's track record does not support such an analysis.

98-1

A second example is the wilderness protection stipulation of existing oil and gas leases within WSAs. BLM claims that it will allow only NSD leasing in Cross Mountain, so wilderness designation is not needed. BLM conveniently ignores in its reasoning the wilderness protection stipulations on existing leases. As the Wilderness Technical Supplement (WTS) notes (4-24), the "wilderness protection stipulation on existing prst-FLPA oil and gas leases would be dropped" if Cross Mountain is not designated wilderness and BLM proceeds with its preferred management for the area. "If they (the leases) are developed, some 90 percent of the WSA would be open to oil and gas exploration and development with associated roads, facilities, and surface-disturbing activities" (WTS at 4-24). How can BLM claim that a preferred management approach which could result in development on 90 percent of the WSA offers protection comparable to wilderness designation? BLM may wish to gamble with irreplaceable wilderness resources in such a fashion, but the public deserves better.

Yet another example of the inadequacy of administrative protections occurs in the RMP/EIS. Under BLM's preferred alternative (RMP at 2-69), most of Cross Mountain would be closed to ORV use. BLM's "permitted uses" uses such as mineral entry under the 1872 Mining Law. This is a loophole through which one could drive a very large bulldozer. Since there are only four existing mining claims that might conceivably be developed after wilderness designation, it is obvious that wilderness offers substantially greater protection for the area. BLM can you honestly claim that such a management scheme as you are proposing offers anywhere near the protection of legislative wilderness designation?

The obvious, straight forward solution to this dilemma is simply for BLM to recommend Cross Mountain as suitable for wilderness designation.

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**Oil and Gas "Conflicts"** - BLM's reasoning that Cross Mountain must be made available for oil and gas development in order to "balance" development in the Little Snake Resource Area against preservation of wilderness values is indefensible. Why does BLM believe that balancing of all competing uses on the 1.9 million acres of federal mineral estate in the Resource Area must take place within the 14,000 acres of Cross Mountain?

Section 202(c)(6) of the Federal Land Policy and Management Act requires BLM to "consider the relative scarcity of values involved and the availability of alternative means (including recycling) and sites for realization of those values" in the development of its land use plans. BLM, how have you considered the relative scarcity of values involved in the case of Cross Mountain? There are 99 other wilderness sites comparable to Cross Mountain in the planning area; however, there are at least 1.9 million acres of federal oil and gas mineral estate, excluding WSAs, in the planning area. Many of these available mineral lands have much greater potential and known reserves than Cross Mountain. No other wilderness candidates have the combination of wilderness values that Cross Mountain possesses. How has BLM considered the availability of alternative sites for realization of oil and gas development in its study of Cross Mountain?

A very telling fact in the comparison of oil and gas needs versus wilderness needs in the Little Snake Resource Area is made obvious by the RMP/EIS (4-25). Over 95 percent of the Resource Area is already leased for oil and gas development. Zero acreage in the Resource Area has been set aside as wilderness, and Cross Mountain would amount to only 0.7 percent of the Resource Area if designated as wilderness.

The supposed oil and gas reserves in Cross Mountain are extremely speculative at best. The WSA states time and time again that there is no substantive information on which to base a definitive finding of oil and gas potential, and certainly no supporting facts for a recommendation against wilderness designation for Cross Mountain. "Due to an inadequate geologic data base, ... the energy and mineral resource potential of the eight WSAs is very difficult to assess in a technically substantive manner" (3-12); "any of these assessments may well be grossly incorrect" (6-24); "the estimates may be grossly in error" (6-24); "these following estimates (assumptions) certainly represent no more than extremely generalized efforts" (A-24).

Compared to the "inadequate", "grossly in error", and "extremely generalized" information regarding potential oil and gas resources, there is well-substantiated documentation of the superlative wilderness values of Cross Mountain in the form of confirmed sightings of endangered species, head counts of big game species, records of visitor use of the abundant and varied recreational opportunities, recorded cultural sites, and obviously scenic panoramas. BLM, where is the balancing of resources in your interpretation and analysis of this available information?

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BLM makes some claims in the RMP/EIS that proprietary information held by companies indicates potential for oil and gas resources in Cross Mountain. If BLM intends to consign such a publicly owned wilderness gem as Cross Mountain to development, why does it not at least make public the damning information for all interested parties to review? Weighty decisions such as wilderness recommendations deserve to be made in full view of the public, and not behind closed doors.

**Water Projects** - BLM has properly noted that wilderness designation of Cross Mountain does not conflict with the once proposed Cross Mountain Dam project. BLM might be interested to know that the 1985 Annual Report of the Colorado River Water Conservation District (CRWCD) no longer even lists the Cross Mountain Dam as a proposed project among their highly speculative list of intended projects. It is entirely appropriate that Cross Mountain Dam is no longer considered as potentially in conflict with wilderness designation.

#### **DIAMOND BREAKS**

The Sierra Club and the Colorado Environmental Coalition support BLM's preferred alternative which recommends wilderness designation for Diamond Breaks. BLM's addition of the gently sloping lands between the existing WSA boundary and Brown's Park National Wildlife Refuge greatly enhances the "completeness" of the proposed wilderness. Preservation within the National Wilderness Preservation System of an intact sample of the Green River floodplain and its adjacent watershed by this boundary addition is a tremendous benefit.

There are other additions that should be made to the proposed Diamond Breaks Wilderness as well. Several errors in the original wilderness inventory resulted in lands adjacent to the WSA in Utah being eliminated from the WSA. It is quite peculiar that in the final intensive inventory decision of November, 1980, BLM made boundary adjustments precisely along the Colorado-Utah state line such that all lands to the west in Utah were dropped from the WSA while lands to the east (in Colorado) were retained. Does BLM have any explanation for this strange deletion?

The lands deleted in Utah include part of Pitt Draw and lands south of Marshall Draw. BLM deleted the southern slopes of Pitt Draw while keeping the northern slopes of Pitt Draw in the WSA. BLM's rationale was that the northern slopes of Pitt Draw are "steep sloped draws ... that provide for outstanding opportunities for solitude" while on the southern slopes of the draw "opportunities for solitude were limited" (Final Wilderness Study Areas, November, 1980). Do you not think it a little strange that only half of a valley possesses solitude? How do you explain such odd reasoning?

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The draw south of Marshall Draw was similarly dropped due to alleged lack of outstanding solitude. This is rather spurious reasoning. This draw is over three miles in length, is surrounded by slopes with impressive rock outcrops, is awash with wildflowers in spring and summer, and is visited by many a soul. BLM should grasp this opportunity to correct its past errors on the western boundary of Diamond Breaks.

What has BLM done about the illegal range projects constructed in 1983 and 1984 at Julian Spring and Hoy Flat Spring in violation of the Interim Management Policy for Wilderness Study Areas? As of April 11, 1986, the Vernal District of BLM had still not taken any corrective action to reclaim the damage caused by its previous mismanagement of Diamond Breaks. The Vernal District has made no effort to reclaim the bladed ways, has made no effort to reclaim the impacted areas around the spring developments, and has generally dragged its feet in living up to its responsibilities. The Vernal District claims that rehabilitation will be completed by September, 1989, as required by BLM in Colorado. Do you not think that Vernal had better start doing something if it intends to speed up rehabilitation by 1989?

#### **WEST COLD SPRINGS**

BLM's recommendation of non-wilderness suitability for West Cold Springs WSA is extremely disappointing. Instead of acting to offer maximum preservation of the precious wildlife habitat in the area, BLM is opening up the entire WSA to oil and gas development.

**Oil and Gas** - BLM has well documented the wildlife attributes of West Cold Springs. Unfortunately, BLM stopped at this point, and has failed to propose adequate protection for wildlife from the impacts which accompany oil and gas development. BLM's preferred alternative will destroy the value for trophy elk hunting on at least 25 percent of the WSA which is slated for an emphasis on oil and gas development (WIS at 4-9). BLM's preferred alternative also results in the maximum negative impacts to water resources (WIS at 4-11). It seems likely that the many tons of increased sediment that will be added to Beaver Creek will greatly degrade the value of this very uncommon trout fishery. Wilderness designation would not lead to these catastrophic results.

How does BLM explain the leasing of a portion of West Cold Springs WSA as part of lease C-36577 in violation of the Congressional appropriations ban on mineral leasing in WSAs? This lease has an issuance date of May 26, 1983, well after the January 1, 1983 date for no further leasing.

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**Boundaries** - The boundaries for West Cold Springs WSA are a history of errors, as are those for Diamond Breaks WSA. An example of BLM's boundary mistakes was the deletion of the Beaver Creek drainage, which was added back to the WSA after a protest by conservation groups. BLM was never justified in deleting many thousands of acres of suitable land to the east of the Matt Trail in the original wilderness inventory either. BLM now admits that the Matt Trail is impassable to vehicles (WIS at 3-22), and is closed to vehicular traffic. Why was it used as the eastern boundary for the WSA in 1980? BLM should further correct its previous error by recommending additional lands east of the Matt Trail for wilderness designation, including Limestone Ridge, and Big and Little Joe Basins.

**Livestock Grazing** - BLM has not made errors only in boundaries for West Cold Springs. BLM has also failed to adequately protect the wilderness values of the area during the interim until Congress acts, as required by law and by BLM's Interim Management Policy. BLM's reaction to the illegal Spitzie Draw water development, constructed within the WSA in 1983, is entirely inadequate. Is BLM in the practice of turning a blind eye when ranchers illegally construct range projects, with no prior environmental review or public participation? Were the conditions for reclamation of the Spitzie Draw water development, as outlined in the September 29, 1983 certified mail letter to Wright Dickinson from the Area Manager, ever enforced? Was the existing bore recontoured, as required? Was remediation done as required? Has the Surface Reclamation Staff determined that compliance has been achieved? Why was not this rancher fined and told to obliterate the illegal structure within the WSA?

**Economics** - In its discussion in the WIS of economic consequences of the alternatives for wilderness for West Cold Springs (4-15), BLM only considers the economic contributions of the oil and gas industry. Is BLM aware that recreation, specifically hunting and fishing, is a multi-billion dollar annual industry in Colorado? Why has BLM failed to analyze the beneficial economic impacts of wilderness designation in the form of preserving and enhancing recreational activities, such as trophy elk hunting? This is a common failing in the analysis for all of the WSAs.

#### **VALUE OF TEARS**

The Sierra Club and Colorado Environmental Coalition support Vale of Tears as wilderness. We disagree with BLM's contention that the area is not outstanding in and of itself. The 7,000 acres are extremely remote and isolated, which, when combined with the outstanding scenic beauty of the area, create an outstanding wilderness candidate. The area's proximity to the Yampa River also greatly enhances its wilderness character, and sets it apart from the other Dinosaur North Adjacent WSAs for that reason.

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98-10 Because of its proximity to the Yampa River, and because of its position adjacent to the east end of Dinosaur National Monument, Vale of Tears would significantly add to the wilderness of the National Monument by offering protection to an additional segment of the Yampa River corridor. Designation of Vale of Tears will greatly enhance, by protecting the viewshed from the river, the wilderness experience of the many thousands of visitors who each year raft the Yampa, and launch their rafts immediately across from and upstream of the WSA.

98-11 The MTS only makes mention of the National Park Service's position with respect to Ant Hills, Chew Winter Camp, and Peterson Draw WSAs (12-110). What is the NPS position concerning wilderness designation of Vale of Tears?

The grazing emphasis proposed for Vale of Tears instead of wilderness is entirely inappropriate. What is the NPS position regarding BLM's proposed 30 percent increase in livestock grazing immediately adjacent to the National Monument? Is the Monument boundary fenced along the WSA? How will BLM prevent livestock trespass into the Monument?

98-12 How can BLM justify extensive range improvements, and estimate a 30 percent increase in livestock forage, when BLM does not even know the existing condition of the ecological seral stage for the allotments in the WSA? According to BLM's RMP/EIS, the ecological seral stage for allotments 4306 and 4309 is entirely undetermined, while the ecological seral stage for two-thirds of allotment 4308 is also undetermined (RMP at A6-18). The condition of the range in allotments 4306 and 4309 is similarly unknown. What is BLM's justification for extensive livestock range projects in the form of spraying 380 acres, burning 1300 acres, and other assorted range projects when BLM can not even say in what condition the allotments are? How does BLM know that these projects are necessary? How does BLM justify an extensive increase in stocking rather than, for example, eliminating all grazing on the allotments, given BLM's non-existent knowledge?

98-13 What is the appropriateness of spraying directly adjacent to the National Monument? What are the potential impacts of such spraying on endangered species such as peregrine falcons? What are the impacts on rare plants and plant associations? Previous spraying programs have had detrimental impacts on nesting peregrines in the area, as BLM must know.

98-14 The resource problems/conflicts listed in the RMP for the allotments in Vale of Tears are almost entirely water sources and fences. How does BLM's proposed spraying and burning address these listed problems?

The Sierra Club requests notification of the environmental review process for the EAs which will be prepared for the spraying program in Vale of Tears, and intends to participate in development of the EAs through public comment, if BLM continues to pursue such a program.

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recreational, geologic, fish, wildlife, and cultural values. As a consequence of the inventory, a Presidential Memorandum dated August 2, 1979 was issued stating:

"Each Federal agency with responsibility for administering public lands shall, as part of its ongoing land use planning and management activities and environmental review processes, make an assessment of whether the rivers identified in the Nationwide Inventory and which are on their lands are suitable for inclusion in the Wild and Scenic Rivers System."

It is the regional policy of the Forest Service in Region 2 to conduct eligibility reports for each of the inventory rivers under Forest Service jurisdiction. For example, the White River Forest Plan evaluated the North and South Forks of the White River and the Crystal River. An eligibility report, as performed by the Forest Service, simply evaluates a river segment against the criteria for designation under the Wild and Scenic Rivers Act, and if the river is determined to possess the requisite attributes, the Record of Decision for the Forest Plan includes a statement recommending a full-scale study of the appropriateness of wild and scenic designation of the river.

The Colorado Environmental Coalition (formerly the Colorado Open Space Council), and by this reference the Sierra Club also, have on innumerable occasions requested that BLM include the issue of an eligibility report for the Yampa River in the Little Snake RMP/EIS. The issue was first raised with BLM at the Craig scoping meeting for the RMP on July 21, 1983. Written scoping comments of August 2, 1983 repeated the issue. I personally raised the issue with Bob Haborchak and Carol MacDonald on February 24, 1984 at the Little Snake Resource Area office in Craig. Our comments on the Issues and Planning Criteria on April 16, 1984 repeated the issue. I again raised the issue with Carol MacDonald on October 29, 1984 and in letters to her on October 30, 1984 and November 19, 1984. The issue was personally broached with BLM again at a meeting March 5, 1985 with BLM in Craig, and in a follow-up letter of March 16, 1985. Finally, during a BLM convened work group meeting on September 21, 1985, the issue was once again repeated to BLM.

98-17 BLM's only response to the question of including this issue in the RMP has been to state that BLM has no policy to include eligibility reports in land use planning documents. Such a response evades the intent of the National Environmental Policy Act of 1969, which requires agencies to include significant issues in an EIS unless they have been covered by prior environmental review (40 CFR 1501.7(a)(3)). Furthermore, BLM's planning regulations require BLM to "comply with the scoping process required by regulations implementing the National Environmental Policy Act" (43 CFR 1610.4-1). The potential eligibility of the Yampa River for Wild and Scenic designation has not been addressed in any prior environmental review. How does BLM explain its failure to adhere to the requirements of NEPA in preparing this RMP/EIS?

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#### ANT HILLS, CHEW WINTER CAMP, PETERSON DRAW

BLM's boundaries for the Ant Hills, Chew Winter Camp, and Peterson Draw WSAs are inaccurate. BLM has mistakenly split one contiguous unit of roadless public land into three separate units on the basis of mapping errors. There are no roads which separate the area into three units. Specifically, there is no road, way, or any sort of vehicle trail down Big Joe Draw all the way to the Dinosaur National Monument boundary on the east side of Ant Hills WSA. The only road in the area climbs out of the draw about one mile north of the National Monument boundary, where the road proceeds due east and forms the northern boundary of Chew Winter Camp WSA. There is thus no physical separation between Ant Hills WSA and Chew Winter Camp WSA.

98-15 Similarly, there is no physical separation between Chew Winter Camp and Peterson Draw WSAs. The road which forms the northern and western boundaries of these areas drops into upper Five Springs Draw without ever dipping down south to meet the National Monument boundary. In fact, where BLM claims to separate the two WSAs, the road is cut into the side of a steep hillside and could not possibly head directly south to meet the Monument boundary.

This is not a question of interpretation of vehicle tracks as a "way" or a "road". There simply do not exist any sort of vehicle paths between the three WSAs. It is therefore improper for BLM to consider any alternative for the three WSAs other than the combined WSAs alternative. Why does BLM continue to pretend that physical separations exist between the WSAs?

98-16 BLM seems to conveniently be playing games with the lease issuance dates of oil and gas leases in Ant Hills and Chew Winter Camp WSAs. In BLM's preliminary draft RMP/EIS, lease C-34238 had an issuance date of 1-1-83, a date in violation of the Congressional appropriations ban on leasing within WSAs. Now, in this version of the RMP/EIS, the issuance date for lease C-34238 has suddenly become 12-6-82. Why has the issuance date for the lease so conveniently changed from a violation of Congressional direction to compliance with the law?

#### LITTLE YAMPA/JUNIPER CANYON

A major shortcoming of the Little Snake RMP/EIS is its failure to address the issue of the eligibility of the Yampa River for inclusion within the federal Wild and Scenic Rivers System.

The Yampa River from the Williams Fork to Dinosaur National Monument was identified in the 1980 Nationwide Rivers Inventory of the National Park Service as possessing outstandingly remarkable scenic,

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As a further note, BLM apparently has been cooperating in the Wild and Scenic evaluation of the Kern River in California, the evaluation of which was not requested by Congress but was proposed by the National Park Service and the Forest Service. Why can BLM not do the same thing in Colorado?

98-17 It has been a favorite publicity tool of BLM in the preparation of RMPs to claim that the public has a meaningful role in the development of the RMPs (as per BLM regulations) and that the RMPs are issue-driven by issues raised by the public. This obviously has not been the case with the Yampa River and the Little Snake RMP. BLM, how do you equate your public pronouncements of issue-driven RMPs with your avoidance of the Yampa River issue?

The serious nature of BLM's failure to address the Yampa River's potential eligibility for inclusion in the Wild and Scenic Rivers System is highlighted by actions proposed in BLM's Preferred Alternative which will destroy some of the outstandingly remarkable values of this Nationwide Inventory River. The RMP/EIS states: "Coal development, however, would destroy some of those values at the eastern end of the Little Yampa Canyon" (4-63). It is astounding that BLM would condone the destruction of these river values without even making an effort to evaluate the river's eligibility before doing so. How does BLM rationalize this?

The few efforts BLM has taken in the Preferred Alternative to protect the Yampa River through Little Yampa and Juniper Canyons are appreciated. The Special Recreation Management Area designation is a good first step toward recognition of the value of the Yampa, though designation as an Outstanding Natural Area, and ultimately as a Wild and Scenic River, would provide more meaningful protection.

98-18 Designation of the Yampa River as a NSD leasing area for oil and gas is a positive step also. However, how much of the river corridor is already leased for oil and gas?

98-19 Why is the proposed Iles Mountain coal leasing tract grandfathered into the Preferred Alternative (RMP at 2-69)? The RMP is supposed to be the planning document which guides management direction for the entire Resource Area. A draft coal leasing document (Green River-Hans Fork II) should not supersede the more important planning guidance for the entire Resource Area. The fact that Iles Mountain may severely degrade the outstandingly remarkable values of the Yampa River, without any analysis by BLM of such loss on the river's potential as a Wild and Scenic River, compounds the seriousness of BLM's approach.

The prohibition on new rights-of-way, mineral material sales, surface coal mining, and surface occupancy for underground coal mining within the river corridor is supported, as are the other protective aspects of BLM's proposed management for the river.

**LIVESTOCK GRAZING**

BLM's analysis of livestock grazing and the recommendations contained in the Preferred Alternative are woefully inadequate. BLM has whitewashed the severe environmental damage done by livestock to date, and instead of implementing the reductions in stocking necessary to alleviate this serious situation, BLM has proposed to construct a wish list of range projects provided by the livestock operators.

98-20

A major difficulty in reading the RMP/EIS is that BLM has failed to identify the range allotments on any map. The reader is thus unable to locate the allotments, or to identify which allotment numbers correspond to which ground in the Resource Area. The RMP would be a much more useable document if it contained such information.

98-21

BLM states that reductions in allotments from 166,895 to 148,821 AUMs will be made (RMP at 2-62), but only if further monitoring justifies such reductions (RMP at 4-18). BLM claims that it lacks sufficient data to demand the reductions immediately. Then, in a startling contradiction, BLM proposes literally hundreds of range projects in 69 allotments, including at least 18,000 acres of herbicide spraying (RMP at 2-64) on these very same allotments for which BLM claims to have insufficient information. BLM, how can you have enough information to embark on a massive campaign of mechanical and chemical range manipulation, but not have enough information to implement reductions in stocking levels?

98-22

According to the RMP, at least 37% of allotment acreage in the Resource Area is in poor condition, while another 33% is in an unknown condition. Should not BLM take immediate action to begin corrective action on the 37% of the range that is known to be in poor condition?

98-23

It would seem logical that range projects should only be undertaken after necessary stocking reductions are made. The RMP's planning criteria (1-7) seems to indicate that stocking levels should be established first, and then needed range improvements should be identified afterwards. It is apparent that BLM is simply bending over backwards for the livestock operators in approving widespread range projects while deferring reductions in stocking levels. The RMP admits as much (4-2) when it states that "the projects proposed in Appendix 11 were determined by operator request." Obviously, the projects have little relation to the requirements for a healthy range and are simply the operators' wish list. Given the abysmal record of range management in the Little Snake Resource Area over the past 20 years, such a continuing approach to range management is not surprising.

The RMP notes that the proposed range projects will have a major impact on ecological seral stages over both the short and long term (4-14). How will BLM determine if beneficial or deleterious impacts are occurring since BLM claims to have a miniscule amount of information on the ecological seral stages of its allotments (Appendix 6)? It is irresponsible of BLM to gamble thus with the public range resources.

A particularly severe consequence of BLM's proposed program is the impact of artificial seeding with non-native species (4-15). What will be the impact of introduced species on the exsiles of rare plant communities and individual rare species which are scattered across the Resource Area, and which have been proposed for Research Natural Area or ACEC protection? Will these non-native species spread rapidly throughout the Resource Area? How will introduced species affect Dinosaur National Monument, which has a legal mandate for preservation in its natural condition? Where in the RMP/EIS has BLM complied with the CED's NEPA requirements for a worst case analysis of introducing non-native species?

98-24

One of the most serious violations of NEPA and federal court rulings is BLM proposal to spray 18,754 acres with herbicides. What herbicide does BLM intend to use? What actions does BLM intend to take to protect endangered plants and animals? What endangered species may be impacted by the proposed spraying program? Where is BLM's analysis of environmental consequences of such spraying?

98-25

Is BLM aware of several federal court rulings in the Ninth Circuit Court which preclude the preparation of a programmatic EIS, including a worst case analysis, prior to embarking on massive spraying campaigns? The Ninth Circuit Court decided in *Save Our Scenic Views v. Clark, SOCATS v. Mott, and NCDC v. Blosch* that federal agencies must prepare a worst case analysis of the impacts of using herbicides on public lands. Where has BLM done such an analysis of using herbicides in its range program in the Little Snake Resource Area?

It is apparent that massive revisions are necessary in BLM's analysis of livestock grazing in the RMP/EIS before it complies with NEPA and federal court rulings.

The Sierra Club, by this notice, requests to be informed of the scoping process for every Environmental Assessment prepared for any and every proposed range project in the Little Snake Resource Area. Notification should be sent to me at the above address.

**MINERALS**

The Preferred Alternative is out of balance in its recommendation to propose 639,000 acres as available for coal leasing. There is no market for such a massive amount of coal. In fact, existing mines are closing right and left. The RMP states that 639,758 acres of coal resources in the Resource Area are unleased (3-20). How does BLM justify making all of the unleased coal available for future coal leasing, particularly at a time of a depressed coal market? This is certainly a dramatically different approach than BLM takes with its scenic wilderness resources, where BLM refuses to make available hardly any of its wilderness resources for future use as wilderness. Does it make any sense to make available public coal reserves in a depressed market, when such leases will not bring anywhere near their full potential value?

98-26

The RMP's identification of the Yampa River as unsuitable for coal leasing under the Alluvial Valley Floor criterion is supported. We also endorse BLM's proposed buffer zone of one-half mile on either side of the Yampa as part of the SRMA.

98-27

BLM's one-sided emphasis of oil and gas leasing with respect to other resources was discussed in our comments under Wilderness. It is rather academic to even talk about restricting oil and gas development when BLM has already leased 95 per cent of the Resource Area without an adequate analysis ahead of time of multiple-use trade-offs or environmental consequences. How can BLM consider the closing of 38,540 acres to oil and gas leasing, as proposed by the Preferred Alternative, to be a "moderate" impact on the 1.9 million acres available for leasing? This is a miniscule 2 per cent of the Resource Area. Compared to the 95 per cent which is already leased, to call 2 per cent a moderate impact is quite an exaggeration.

**LANDS**

BLM's identification of zones for acquisition of land through purchase or exchange is a welcome addition to the Preferred Alternative. We particularly support the acquisition zone along the upper Yampa River and adjacent to the Forest Service's proposed Service Creek Wilderness. BLM is encouraged to retain in public ownership all lands adjacent to the National Forests.

**WILDLIFE**

BLM has designated its "Key Wildlife Species" in the RMP with the wrong intent (RMP at 3-43). The purpose of identifying key species, or indicator species, is to gauge the health of the various ecosystems on the public lands. Towards this end, species indicative of the health of riparian zones and the other various ecological zones in the

98-28

Resource Area should be identified. BLM has simply listed those species protected by law, of interest to hunters, and a few other factors of interest to the public. What about migratory songbirds that might have a particular ecological niche which could be used as an indicator of ecological health? How does BLM intend to monitor the ecological health of Beaver Creek, for example? The list needs to be revised with an eye towards broadening its ecological representation. For example, the Grand Junction RMP included several species of frogs and songbirds in its list of key species.

98-29

**CORRIDORS**

The identification in the RMP of particular corridors as unsuitable for utilities, transmission lines, and other rights-of-way is supported. We agree that corridors number 18 and 19 (RMP at 2-24) are unsuitable.

**SPECIAL MANAGEMENT AREAS**

It is disappointing that BLM did not believe it appropriate to offer more protection for its rare plant species and rare plant communities. The few RNAs and ACECs proposed are but a tiny portion of the Resource Area. The public benefit of offering the greatest protection available, through SRMA designation, far outweighs the insignificant decreases in potential outputs of commodities. Livestock production on the public lands accounts for only 2 per cent of America's beef; it seems silly to take chances with rare species of plants for the benefit of a few more cows.

In particular, the Ink Springs and Vermilion Bluffs RNAs should be included in BLM's Preferred Alternative. While the ACEC designation for Irish Canyon is a start, more complete protection would be afforded Ink Springs by RNA designation.

98-30

Designation of Vermilion Bluffs RNA would prevent a prescribed burn under the Energy and Minerals Alternative (RMP at 4-21). Is this same prescribed burn proposed under the Preferred Alternative? What is the impact of the prescribed burn on the rare plant association for which the area is proposed for designation? What is the impact of increasing forage, and thereby increasing livestock use? How can BLM justify the range projects to increase livestock use in this area since BLM claims it lacks sufficient forage information to make reductions in stocking levels? It is really necessary to increase livestock use at the expense of rare plant associations?

Mr. William Pulford  
April 14, 1986  
Page 16

98

99

**WILD MOUNTAIN**

98-30 BLM's emphasis area prescription for Wild Mountain is entirely inappropriate. Wild Mountain, as its name implies, is adjacent to a remote corner of Dinosaur National Monument. Wild Mountain towers above the Jones Hole fish hatchery, and offers fabulous views of the National Monument from its ridgetop. BLM has applied an oil and gas emphasis prescription to Wild Mountain. Given its natural attributes, a prescription for recreation or wildlife would be much more appropriate. Why would BLM apply an oil and gas prescription? Wild Mountain is in one of the lowest interest areas for oil and gas in the Resource Area, and could only be considered to have moderate potential at best. Given its location amidst a fish hatchery, a wilderness area, and a national monument, a recreation or wildlife emphasis is better suited for the area.

Sincerely,

*Mark Pearson*

Mark Pearson  
Chairman, Rocky Mountain Chapter, Sierra Club

April 24, 1986

William J. Pulford, District Manager  
Bureau of Land Management  
Craig District Office  
455 Emerson Street  
Craig, Colorado 81625

Dear Mr. Pulford:

Please accept my comments regarding the Little Snake Resource Area Resource Management Plan (RMP). I was unable to attend any of the hearings because of the long traveling distance. I have visited the Little Snake RA often, and have several topics to discuss concerning the RMP.

To begin with, I have just finished reading the Animal and Plant Health Inspection Service (APHIS) Biological Assessment for the Mormon Cricket Control Program. This assessment states the pesticide spraying will occur in NW Colorado on public lands administered by the BLM. I have a couple of observations:

- 99-1 1) APHIS lists bonytail chub as an endangered species of fish near extinction and that it is found in the lower portion of the Yampa River around Dinosaur National Park. Are these fish found in Little Snake RA? They are not included in the list of endangered species on page 3-47 of the RMP. I would urge the BLM to check into this matter and report in the final RMP their findings.
- 99-2 2) The RMP doesn't seem to mention the Grasshopper and Mormon cricket control programs even though spraying occurs on BLM lands and has occurred in this RA for years. Are you heavily involved with the administration of this program since it involves BLM lands? Why is no mention made in the RMP? I hope this error is remedied in the final version of the RMP. I would like to take this opportunity to urge the BLM and APHIS to use natural grasshopper/Mormon cricket predators such as *Hosena locustae* and also Carbaryl/Hosena bran baits. This would provide immediate and long-range control of the grasshoppers and Mormon crickets.

I was pleased to see the recommendations of Irish Canyon as an Area of Critical Environmental Concern and Limestone Ridge as a Research Natural Area. As you well know, these areas are home to several unique species of plants and deserve protection.

- I am concerned that BLM fails to recognize the need for a wild and scenic river evaluation for the Yampa river between Craig and Maybell. The National Park Service has seen fit to identify its section as suitable for inclusion into the Wild and Scenic River System. Why has the BLM omitted this evaluation from its multiple-use, all resource encompassing RMP? I hope this topic also shall be included in the final RMP.
- 99-3

Sheryl Kinnear  
Little Snake RMP Comments  
Page two

99

100

Concerning Wilderness. I am pleased that Diamond Breaks drew rave reviews and that BLM has recommended it to Congress to be included in the Wilderness System. I do not need to repeat the credentials of Diamond Breaks since I agree with your recommendation. However, BLM has committed an error by not recommending Gold Springs Mountain WSA, Cross Mountain WSA, and the Dinosaur Adjacent Units WSAs (including Vale of Tears). These areas represent a small percentage of land in the Little Snake RA, so any conflicts with oil and gas should be easily solved since a larger percentage of land is still available for such resource development. Each WSA is unique and imminently qualifies as wilderness. I have visited each and every WSA in the Little Snake RA and feel each is worthy of wilderness protection--not just administrative protection. Administrations change and therefore, so does the protection to the area. I need not repeat in glowing terms all of the attributes of these WSAs. In fact, it is ironic that BLM has chosen a picture of Cross Mountain to grace the cover of its RMP, yet does not recommend Cross Mountain be fully protected--a protection brought about with wilderness designation.

99-4

In regard to grazing, I feel poor management of lands is occurring in Little Snake RA. It is unfortunate that BLM refuses to cut back on grazing even though 1/3 of the range is in unsatisfactory condition and 1/3 is in unknown condition. I am hoping stricter measures will be undertaken and included in the final RMP.

99-5

Thank you for this opportunity to comment on the Little Snake RA RMP.

Sincerely,

*Sheryl A. Kinnear*  
Sheryl Kinnear  
P.O. Box 204  
Grand Junction, CO. 81502



Mr. William J. Pulford  
District Manager  
Bureau of Land Management  
Craig District Office  
455 Emerson Street  
Craig, Colorado 81625

Re: Little Snake Resource Management Plan and Environmental Impact Statement

Dear Mr. Pulford:

Thank you for furnishing me with a copy of the draft RMP/EIS. I appreciate the opportunity to review and comment upon the document.

There are certain management actions described in the RMP/EIS upon which comment is needed. However, I believe it best to withhold such comments until I have the opportunity to review the data and factual information considered by the BLM in formulating the preferred alternative and various management actions.

Chapter 2, "Management Guidance Common to All Alternatives", lists the compatible and excluded uses common to all alternatives considered by the BLM. An excluded use common to several of the management priority areas including Wildlife Habitat FPCAs, Soil and Water Resource FPCAs, Livestock Grazing, and Wildlife Habitat is that "lands would not be leased for other mineral development involving surface mining of federally owned minerals."

- 100-1 Recognizing that the BLM always acts for the greater good of the public and never in an arbitrary or capricious manner, it is a foregone conclusion that the BLM must possess irrefutable evidence that justifies a complete ban of surface mining for Other Minerals within certain management priority areas. The RMP/EIS itself has a plethora of information regarding conflicts between surface mining and other uses and so where in the document have I found supporting evidence to justify the extremely harsh management action proposed by the BLM.

P.O. Box 1148, Craig, CO 81626/303 824-8294  
XXXXXXXXXXXXXXXXXXXXXXXXXXXX

Mr. William J. Pulford  
April 28, 1986  
Page Two

100

Therefore, I would like to formally request that I be allowed to examine all factual information and data gathered by the BLM that supports the BLM's conclusion that surface mining of any type, of any scale, for other minerals presents conflicts with the above uses that cannot be mitigated.

After reviewing the BLM's long term studies and baseline data, I will be better able to comment on the RMP/EIS and the management actions presented therein. If convenient, I would ask that the data and factual information be made available at the earliest opportunity so that I may have time to review and digest the data and information prior to expiration of the comment period.

One slight inconsistency that should be brought to your attention is that, although the BLM believes that surface mining for other minerals should be banned within certain management priority areas, the BLM apparently approves of these same activities being conducted in Other Mineral priority areas. Logic would dictate that if these activities are totally incompatible with surface mining then they should be banned within Other Mineral priority areas. Given the fact that Other Mineral development was largely ignored in the RMP/EIS process, this inconsistency undoubtedly causes little concern within the BLM.

Once again, I thank you for the opportunity to participate in the RMP/EIS process.

Very truly yours,

*Garry L. Miller*  
Garry L. Miller  
Administrative Manager



United States Department of the Interior  
BUREAU OF MINES

P.O. Box 966  
Building 20, Denver Federal Center  
Denver, Colorado 80225  
Intermountain Field Operations Center

101

April 23, 1986

Memorandum

To: District Manager, Craig District Office, U.S. Bureau of Land Management, 455 Emerson Street, Craig, Colorado 81623  
From: Chief, Intermountain Field Operations Center  
Subject: Review of draft environmental impact statement/resource management plan and wilderness technical supplement for Little Snake Resource Area, Colorado

As you requested, Bureau of Mines personnel have reviewed the subject reports regarding proposed management of 2.4 million acres of Federal land and/or minerals, including eight wilderness study areas (WSA's) (90,887 acres), in northwest Colorado. Our comments pertain to the discussion of mineral resources and the assessment of impacts under the plan.

Minerals are considered under the issue of "determination of suitability of certain areas for leasing and development" (Plan, p. 3-3, -6); in general, the planning criteria are designed to encourage development of Federal minerals.

Mineral resources, activities, and potential of the resource area are described in considerable detail in the documents. As noted in the plan (pp. 3-16 to 3-38), known resources of coal, oil and gas, uranium, and other minerals are substantial, and the potential for additional deposits of these and for other minerals is high.

- 101-1 We note that coal potential (i.e., coal development potential, App. 1) is rated differently from the potential for all other minerals (App. 3). This difference is not apparent in the body of the report and may cause confusion, for example, in Table 3-4 where several "natural history areas" with known coal resources are rated "L" (Low) in mineral resource potential. The table is, nevertheless, a valuable indication of mineral potential in those special management areas where mineral development is likely to be restricted. Incidentally, the heading "Base/Precious" should be centered over the "Metals" column in this table rather than over "Other."
- 101-2

101

The Bureau of Mines has not, as yet, made mineral land assessments of any of the wilderness study areas in the resource area; field studies are scheduled for Diamond Brooks this summer and for Cross Mountain in FY 87, however.

- 101-3 Assessment of mineral-related impacts (Plan, pp. 4-3 to 4-13) is quite detailed and thorough. As stated in the plan (p. 4-5), coal resources are so vast (5.8 billion tons in the Federal coal planning area alone) that the "acreage available under any alternative would meet present and projected coal demands." We believe, however, that substantial tonnages of surface-minable coal would not be recoverable in areas found unsuitable for surface mining methods—which aggregate 742,300 acres in the preferred alternative—as a result of the unsuitability review, multiple land use decisions, and surface owner consultation. This cumulative loss of shallow Federal coal, which may include less costly and readily minable coal, is not described but should be discussed in the statement. The affected coal includes that portion of the 400 million tons (not 4 million as stated on p. 2-62) of coal in the 242,300 acres that could not be mined by underground methods.

We concur with the impact analysis for oil and gas. Under the preferred alternative, about 56% of the Federal oil and gas acreage would be available subject to standard stipulations and 35% would be subject to seasonal restrictions which would not greatly affect oil and gas activities. As noted in the statement, about 8% of the area would be subject to more severe restrictions that would inhibit or preclude recovery of oil or gas; some of these areas have high potential for such resources.

- 101-4 One point, regarding "critical habitat," should be clarified. Apparently, the term is used in the documents in an informal manner, and not with the formal meaning as found in the Endangered Species Act of 1973 or 50 CFR. We are not aware that any critical habitat has been designated in northwestern Colorado (50 CFR 17.94 to 17.96). The term should be defined in the Glossary; perhaps another less formal term, such as key or crucial habitat should be used instead.

Thank you for the opportunity to comment.

*William Cochran*  
William Cochran



United States Department of the Interior

FISH AND WILDLIFE SERVICE  
ENDANGERED SPECIES OFFICE  
400 SOUTH  
INDEPENDENCE, IOWA  
50641-8105  
GRAND HUNTER, COLORADO 81309  
TELEPHONE 903-241-0055  
April 23, 1986

102

MEMORANDUM

TO: District Manager, Craig District, Bureau of Land Management, Craig, Colorado  
FROM: Project Leader, Endangered Species Office, U.S. Fish & Wildlife Service, Grand Junction, Colorado  
SUBJECT: Draft Environmental Impact Statement for the Little Snake Resource Area

We have reviewed the Draft Resource Management Plan (RMP) for the Little Snake Resource Area. As you are aware, the Endangered Species Act (ESA) requires the Federal action agency to consider possible impacts to proposed and listed species and their critical habitats and to determine if the proposed action may affect such species or habitat areas. Should the Bureau of Land Management (BLM) make a "may affect" determination, then formal consultation should be initiated. Because management proposals identified in the plan seem, at this time, too general to make a "may affect" determination for any species with certainty, it is our suggestion that informal consultation continue as specific actions are planned for the resource area rather than trying to make a blanket determination for the broad RMP. By consulting on a case-by-case basis on specific actions, we will know exactly what action is being contemplated and will have the advantage of the latest biological knowledge for the species involved. Your memorandum of October 22, 1985 recognizes this obligation.

It appears that the Coal Development criteria have been appropriately applied. It should be recognized, however, that "designated areas" (unsuitable) does not necessarily satisfy BLM's obligations for the requirements of Section 7 of the ESA. As an example of what is meant by "consulting on specific action", if it is determined that additional coal leasing actions proposed by BLM within the Little Snake Resource Area "may affect" federally listed species, formal Section 7 consultation will be required.

Specific Comments

- 102-1 Page 8-5, Table 8-1 Throughout the document the term "Threatened/Endangered, Candidate, and Colorado BLM Sensitive Plants" is evaluated. To be consistent, it would seem appropriate to give similar treatment to BLM animals.



Page 2-14, right hand column, 5: It should be remembered that any consultation under Section 7 must precede the Federal action. We also advise that prospective applicants be notified at the earliest possible time of the need to satisfy requirements of the ESA, where appropriate.

Page 2-14, Table 2-1: Seasonal restrictions for bald eagles may result through formal consultation with the FWS. It is conceivable that data recommended through consultation to protect bald eagles may be different than those included in this table.

102-2 Page 3-43, Table 3-11: This table should reflect those species included in FWS memorandum dated October 16, 1985.

102-3 Page 3-47, Table 3-13: This table should reflect those species included in FWS memorandum dated October 16, 1985.

102-3 Page A 2-11: RIM should clarify that the use of the word consultation in this appendix does not refer to consultation that may be required under the ESA.

#### Plant Issues

102-4 Another candidate plant is known to occur in the Little Snake Resource Area and does not appear in your text on P.3-40. It is *Cirsium canbyi* which was collected about 14 air miles west of Maybell, southwest bank of Yampa River, Cross Mountains, in erivies and talus of limestone cliffs. This is the only known Colorado location, the others being in northeastern Utah.

We recommend that the eleven Special Management Areas (SMA's) for plants and wildlife be designated for their special values and/or pristine condition. These 23,315 acres are a very small part of RIM administered land on the Little Snake Resource Area (less than 1%) but whose natural values are quite high. Also, we would like to work with you on identifying potential SMA's for the Federal candidate T&E plants that occur in the Little Snake Resource Area.

Should you require additional information, please contact John Anderson or Bob Lemmlein of this office, telephone 303 241-0553, FTS 322-0949. Thank you for your interest in conserving endangered species.

*Robert P. Smith*

103-1 would surely be fleeting and insubstantial, at best!

As a conscientious member of the public you are wisely making your recommendation these areas for Wilderness designation: Cross Mountain, Cold Spring Mountain, and the five small areas adjacent to Dinosaur National Monument.

Meanwhile, I support the protection the BLM has awarded to high canyons, as well as the Diamond Blanks in Idaross recommendation. But I hope that areas which represent a conflict of interests, like the areas I listed above, will receive a fair trial and not be sentenced to destruction for a dollar. Should the BLM insist on this judgement against wilderness, the public will surely recognize your flagrant bias.

Sincerely,

Susan G. Tucker  
PO Box 519  
Crested Butte, CO 81324

April 26, 1986

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson St.  
Craig, CO 81625

Dear Mr. Pulford:-

I have recently become aware of the BLM Wilderness recommendations for northwestern Colorado, while I support some of your decisions, I feel that certain areas have been considered unfairly and I hope that you will look at them more reasonably.

The areas I am most concerned about comprise a very small percentage of the Federal land available for oil, gas, minerals, and grazing interests in your district. Yet the rich ecological resources within these small areas will be endangered if they are not adequately protected - which means designation as Wilderness, nothing less. The ecological diversity, species habitats, and recreational opportunities which are protected by wilderness designation are truly invaluable, while the development potential

103-1

4318 Fawcett Ave. N.  
Seattle WA 98103  
April 4, 1986

William J. Pulford  
Craig District Manager  
B.L.M.  
455 Emerson Street  
Craig, CO 81625

Dear Mr. Pulford and Staff:

In response to the Little Snake Resource Area Management Plan:

While living on Colorado's West Slope for 7 years, I visited 2 of your Little Snake Wilderness Study Areas, along with a number of other West Slope WSA's. I commend recommendation of Diamond Blanks for Wilderness. My on-foot investigations showed much wildness, beauty, solitude, considerable wildlife, ruggedness and geologic features of interest. No where else have I ever heard sawwhet owls call so clearly. I also remember spectacular quartzite ledges.

104-1 I also enjoyed my on-foot tour of Cross Mountain WSA enormously. I feel strongly that you should reconsider your non-wilderness recommendation for this area, for no other designation offers the reliable protection of wilderness status. Cross Mountain scenery is definitely first class, both within and from above the Yampa Gorge. However, I was not prepared for the impressive grasslands well above the Gorge. I have not seen anything quite like them in my ramblings around Colorado since 1968. I might add that on this hike I took along a friend who is far more typical of mainstream Americans than myself, being a pleasantly overweight mother with 3 TV's, house and car mortgages and being politically conservative. While the walk was longer than my friend liked, she stopped complaining when she saw the antelope and found an eagle feather. She became most enthusiastic about her whole experience and the area. My point is that it is difficult to evaluate an area and create support without extensive field visits. I feel privileged to have seen first hand so much Public Land. If more Americans had the experiences I've had, there would be a clamor for wilderness protection. In the meantime I feel that B.L.M. should accept the observations of those who have been to the WSA's.

For this reason I support the recommendations of my former Colorado colleagues who feel each Little Snake WSA would benefit the wilderness system by protecting wildlife or enhancing Dinosaur National Monument's boundaries. It is my view that the amount of acreage proposed for wilderness designation is a pittance compared to the acreage open to oil and gas and mineral exploration.

104

I also want to mention my concern about livestock grazing on Public Lands. The more I see and explore western public lands the more I am aware of the poor health of these lands. Not everyone can sense the damage that has been done, but it's there, I'm convinced. B.L.M. should not wait any longer to implement grazing reductions.

I hope these comments are helpful in evaluating the public's experience on public lands. I feel I represent a large number of folks with non-vested financial interest in Public Lands. I look forward to following the planning process.

Sincerely yours,

*Jeanne T. Hemphill*  
Jeanne T. Hemphill



# 105

## United States Department of the Interior

GEOLOGICAL SURVEY  
RESTON, VA 22092

In Reply Refer To:  
WGS-Me11 Stop 423

### Memorandum

To: District Manager, Bureau of Land Management,  
Craig, Colorado

From: Assistant Director for Engineering Geology

Subject: Review of draft environmental statement for Little Snake Resource Management Plan, Moffat, Rio Blanco, and Routt Counties, Colorado

We have reviewed the statement as requested in a letter included in the statement dated February 1986.

The statement should address sanitary facilities provided for public and staff on the resource management area and should assess the potential for related impacts from these facilities on ground-water and surface-water resources. If landfills or other types of solid-waste disposal facilities are permitted, the potential for ground-water impacts and mitigation measures should be discussed. The choice of sites for water-supply wells is discussed on page A10-1 of the statement should consider not only geology but also the potential for pollution or contamination from sources such as sanitary facilities and solid waste facilities or areas of cattle concentrations. The analysis of impacts from oil and gas development should address the potential for adverse effects on aquifers from disposal of saline formation waters. Effects of the surface mining of coal may include not only degradation of ground-water quality, as discussed on page 4-36 of the statement, but also destruction and dewatering of some aquifers and lowering of ground-water levels over sizeable areas; these effects should also be considered.

*J. F. Devine*  
James F. Devine

Copy to: District Chief, WRD, Lakewood, Co

106

Robert D. Brockhaus  
913 Thayer Drive  
Richland, WA. 99352-3857  
April 30, 1986

William Pulford  
Bureau of Land Management  
455 Emerson St  
Craig, CO. 81625

DEAR WILLIAM PULFORD:

AS A FORMER UTAH RESIDENT, WHITEWATER BOATER AND AN OUTDOOR ENTHUSIAST I'M AMAZED THAT THE BLM DID NOT INCLUDE CROSS MOUNTAIN FOR FURTHER WILDERNESS STUDY. I DON'T KNOW WHAT CRITERIA YOU USE IF CROSS MOUNTAIN DOESN'T EVEN QUALIFY FOR FURTHER STUDY. I WOULD ALWAYS LIKE TO BE ABLE TO KAYAK THE YAMPA IN ITS UNSMILED AND UNDEVELOPED STATE.

106-1 **106-1** ALTHOUGH CROSS MOUNTAIN MIGHT HAVE POTENTIAL OIL AND GAS RESERVES, THERE ARE OVER A MILLION ACRES OF AVAILABLE FEDERAL LAND THAT SHOULD BE DEVELOPED FIRST. THE MINERAL RESOURCES AND RECREATIONAL-ECOLOGICAL VALUES SHOULD BE CAREFULLY AND CLEARLY DEFINED AND COMPARED IN A WILDERNESS STUDY. THE CROSS MOUNTAIN AREA CAN ALWAYS BE OPENED IF THE WILDERNESS STUDY IS NEGATIVE. PLEASE RECONSIDER YOUR SHORT-SIDED DECISION AND INCLUDE CROSS MOUNTAIN AS A WILDERNESS STUDY AREA.

Sincerely,

*Robert D. Brockhaus*

107

HENRY G. WRIGHT  
ATTORNEY AT LAW  
P.O. BOX 1518  
101 WASH AVENUE  
DURANGO, COLORADO 81301  
(303) 289-3203

May 1 1986

Bureau of Land Management  
455 Emerson St.  
Craig CO 81625

Dear Sir/Madam:

Thank you for the opportunity to comment upon the Resource Management plan for the Little Snake Region.

First of all, I wish to support the inclusion of Diamond Breaks into the wilderness system. This area has a tremendous amount of natural diversity, and contains many opportunities for primitive recreation. The scenery is splendid, and is well worth protecting.

107-1 I can not support your other decisions concerning wilderness. Most disturbing is the failure to include Cross Mountain. The terrain itself is spectacular, and it offers numerous opportunities for primitive recreation. What is especially irritating is that a herd of big horn sheep has been introduced at considerable expense, and the failure to include Cross Mountain as wilderness is bound to effect the survival of this herd. Both from the stand point of animal watching and hunting, this herd is valuable to the region as a whole. Further, with the occasional outbreaks of disease in the herds in the mountains, it is even more important that this magnificent animal receive as much protection as possible. Basically, the only way to provide the protection is through congressional inclusion into the wilderness system. Short term protection through the administrative process is just not enough.

107-2 In examining the rationale for excluding Cross Mountain, I note that very little examination of the cultural resources has taken place. Since there is considerable opportunity for sites within the BLM, I find it reprehensible that the BLM has failed to carefully examine the area.

107-2 I also disagree with the BLM's failure to include West Cold Springs as a wilderness area. Again, a big horn sheep herd is at stake, and again, cultural resources have not been adequately surveyed. The area offers superb scenery and opportunities for primitive recreation.

107-1 I must admit that I do not have any first hand knowledge of the BLM's adjacent to Dinosaur National Monument. However, I certainly disagree with the BLM's conclusion that the areas are too small. The purpose of these small sites are not as destinations, but rather to round out the already very extensive wilderness found at Dinosaur National Monument. This is especially important for the Vale of Tears site, which is very close to a major put in point for river use.

107

I feel that Irish Canyon should have also been included as a USA. This area has great primitive scenery and opportunities for primitive recreation. Furthermore, there are some superb archaeological sites well worth protecting. In addition to the wilderness areas, I believe that the rest of the region should receive the protection found in the Natural Environment Alternative. The land is too valuable to Wastehrough overgrazing or careless forestry practices. Thank you for considering my input into your plan. Please inform me when the next administrative step has been taken.

Sincerely,

*Henry O. Wright*  
Henry O. Wright  
Attorney at Law

HOU/ps

108

Sally J. Cole  
841 O'Quay  
Grand Junction, CO 81501

William J. Puffer  
Craig District Manager  
BLM  
Hos Emerson  
Craig, CO 81605

Dear Mr. Puffer:

I would like to commend the L. Ho Snake / Craig decision to recommend Diamond Breaks USA for wilderness designation. I am familiar with the Brown's Park / Dinosaur Nat'l Monument area and feel that Diamond Breaks is certainly qualified for wilderness inclusion. I am very concerned that fine USA's which provide needed buffer zones and protection, as well as wilderness qualities in their own right, have been disqualified from wilderness inclusion. I urge that Craig / Little Snake BLM reconsider Lost Hills, Chew Winter Camp, Peterson Draw, Lope Draw and Vale of Tears. I understand that the Department of Interior is urging land management agencies to consider protection of National Park lands in making management decisions. This seems like a reasonable thing for Craig / Little Snake BLM to do as the criteria for disallowing the USA's are very subjective and do not consider them

108-1

potential protection and management of the wilderness values of Dinosaur National Monument.

I can see no reason for not considering Cold Spring Mountain and Cross Mountain USA's for inclusion in wilderness. This is not multiple use management! The majority of lands managed by Craig / Little Snake BLM are open to mineral exploitation at the expense of the public. So set aside relatively few acres for wilderness protection - outstanding coverage for solitude, cultural resources, natural beauty, biologic diversity and wildlife - is good and proper management. I urge you to reconsider the decision published in the Draft Wilderness Technical Supplement, February 1986, concerning Cold Springs and Cross Mountains.

Please include this letter in the public comment record.

Sincerely,

Copy to: Representative Mike Stang Sally J. Cole

109

PRODUCING DEPARTMENT  
DENVER, COLORADO

May 1, 1986

GOV  
FEDERAL GOVERNMENT  
BLM Little Snake Resource Area  
NW Colorado



TEXACO  
CMA  
P.O. BOX 800  
DENVER, CO 80201  
400 DTC BLVD.  
DENVER, CO 80202

Mr. Duane Johnson  
Program Manager  
Little Snake Resource Area  
Bureau of Land Management  
435 Emerson  
Craig, Colorado 81625

Dear Mr. Johnson:

Thank you for the opportunity to comment on the Draft Little Snake Resource Management Plan and Environmental Impact Statement. Texaco has numerous operations in the Little Snake Resource Area and has been in or very near the area for some 60 years.

We are disturbed over a number of items in the Plan, but one of the very serious appears to be the lack of a trade-off analysis to determine resource priorities. The Little Snake RA is an oil and gas province, and it should be known just exactly where oil and gas stand with the other resources.

109-1 The concept of Federal Mineral Constraint Areas on split-estate lands is something new to us, and we imagine that there will be many challenges to your authority. We cannot find any identity of the areas involved. Once identified, an analysis of their resource potentials is necessary.

109-2 There is a statement on Page 4-86 that is difficult to understand. When it is necessary to close access to public lands for the development of federal resources, the loss of public access would be compensated for by opening private lands held by the company developing the federal resources for public recreation. How would the company developing federal resources obtain authority to open private lands for public recreation?

Mr. Duane Johnson  
May 1, 1986  
Page 2

109-3

It is noted that the RLM plans to use NSO stipulations for oil and gas leases on certain SMA's containing rare vegetation. However, on these same SMA's where NSO stipulations are planned, livestock grazing will be permitted. This appears to be a paradox to us. What safeguards will be used for grazing that cannot be used for oil and gas operations?

Very truly yours,

TEXACO INC.

*G. M. Barrow*  
G. M. Barrow

GMB:JE

Salina, Kansas  
May 1, 1986

Mr. William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

Dear Sir:

This is to express my thanks and appreciation to you for the recommendation for wilderness of the eight areas surrounding Dinosaur National Monument. These important areas will greatly enhance the Monument itself, and the proximity of all these areas should make it much easier to administer each as it should be.

However, I would like to take issue with the omission of several key areas under consideration. The first of these is that of Gross Mountain. Surely, even on the grounds of protection for threatened or endangered species--it is the temporary or permanent home of six of these--it would merit special care in perpetuity. But with the additional values of its exceptional scenic qualities--a thousand-foot gorge, uncharted caves, views of distant mountains, the Yampa River rapids and bighorn sheep--and also the possibility of cultural riches left by former inhabitants, this area seems obviously to encompass the overall values that would demand full wilderness designation. When these are set against the three dry holes recently drilled there for oil and gas, and against the fact that the entire area contains only one percent of the acreage for federal oil and gas in the vicinity, it seems quite unreasonable that the area would not have been included for designation.

I would also like to put in a plea for inclusion of the five Dinosaur Adjacent Areas, especially Vale of Tears, an outstandingly lovely valley that serves as a boat launch for traveling on the Yampa. It doesn't seem too much to ask that such a small area could be included in the overall plan, and it would be a fitting addition.

Once more, I'm very grateful that you have recommended the eight areas that you have for wilderness. I'm also hoping that you'll be able to add Gross Mountain and the Dinosaur Adjacent Areas--especially Vale of Tears--in your final recommendation. The present overcrowding and increasing use of nearly all areas of American parks and wilderness are proof that future generations will thank us for preserving as much of our beautiful and precious lands as possible for their enjoyment and wonder as well as ours.

CHRIS SLITZ  
124 S. HILLDALE BLVD  
SALINA, KS 67401  
cc. Colorado Environmental  
Coalition

Sincerely,

*Chris Slitz*

C.R. COLE  
315 N. 31 ST.  
Grand Jct, CO 81501  
5-1-86

MR. William J. Pulford  
CRAG DISTRICT MANAGER, BLM  
455 EMERSON  
CRAG, CO 81625

Dear Mr. Pulford,

Following are my comments on the Draft Resource Management Plan & Environmental Impact Statement for the Little Snake Resource Area. Please include them in the public record.

I agree that Dinosaur Snake WSA should be designated as wilderness.

I don't agree with the BLM conclusion as to many other WSA's, all of which are not recommended for designation. All WSA's should be designated as wilderness.

Each area, by your own analysis, qualifies for designation. The only factor in each case which appears to be obstacle to BLM analysis is money--economic development. There are no criticisms of any of the areas in & of themselves, only that designation may conflict with some possible future economic development. The use of these areas is completely unnecessary for economic reasons. There are better and more plentiful choices elsewhere.

Therefore, I strongly urge the designation of Gross Mountain WSA, a unique area and one not even particularly attractive for other purposes, as wilderness. I also urge designation as wilderness, of West Elk Spring, Ant Hill, Chew Water Camp, Pelham Draw, Taper Draw, and Vale of Tears WSA's. Thank you.

Sincerely,

C.R. Cole

XC: Rep. Mike Strang

## GRAND MESA BOAT WORKS

Traditional Sail and Pulling Boats

Cañon Craft Canoes

April 28, 1986

BLM  
455 Emerson St.  
Craig, CO 81625

Dear Sir:

About 45 years ago, one night many years ago, four of us arrived with a little surplus aircraft life raft at the entrance to a fairly not formidable canyon. It was the right river we were sure, but the canyon didn't look like any place we belonged.

As it turned out we were at the eastern entrance to Gross Mt. Over the years the place has grown to assume a somewhat sinister aspect in my mind. I tend to think of it as the entrance to the Underworld.

I have often went to get back up there but have just never made it. I think that the area would make a wonderful addition to our wilderness. There is no doubt in my mind that in the long run--and that is the view we must take--the highest and best use for the area is as wilderness.

We already have plenty of cows and oil, and places to throw beer cans, to last for the foreseeable future. In the event that the Republic lasts another few hundred years, marvelous places like Gross Mt. will be highly treasured.

Sincerely,

*James W. Thayer*  
James W. Thayer

113

5/2/84

Mr. Johnson,

113-1

I've heard about the B.L.M. is considering closing the area and we are to understand. I have stated the area will close on the area is still one of the few places a person can take a family and do nothing but look at the people from the distance for area to the Colorado and we are the one year round to improve.

It seems that every year you have a more of the public lands keep closing. I don't see you saying leave the area alone.

Thank you  
Allen Ruch  
P.O. Box 774727  
Colorado Springs, CO  
80927

114

124 Lands Lane  
Cody, Wyo. 82601  
May 2, 1986

Dear Mr. Pulford

I strongly agree to the recent recommendation by the BLM regarding wilderness designation for the Cross Mountain wilderness study area. This unique and ecologically diverse area which contains several endangered and threatened species should not be left open to mining claims. The 1400 acres of Cross Mountain are surrounded by almost 2 million acres of coalbed methane land for oil, gas and mineral speculation.

Please don't let this recommendation stand. This beautiful area, encompassing river gorges, mountains and a large wildlife population should be protected. Thank you for your help in obtaining wilderness designation for Cross Mountain. Sincerely, Susan Schramm

114-1

STATE OF COLORADO  
Richard D. Lamm, Governor  
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF WILDLIFE  
James B. Ruch, Director  
6060 Broadway  
Denver, Colorado 80216  
Telephone: (303) 297-1182  
711 Independent Avenue  
Grand Junction, CO 81505

115



April 29, 1986

Mr. Bill Pulford  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

Dear Bill:

Colorado Division of Wildlife biologists have reviewed the draft Little Snake Resource Management Plan. It appears to us that we have made very little progress since our first meeting on this issue. In earlier correspondence we requested that the numbers issue be dropped. I fail to see that they serve any purpose in the draft since no cuts will be made until a monitoring plan has been completed. The RMP does not address any monitoring plan nor does it identify where funds might be available to do any intensive monitoring. Does this document which decides only to monitor meet the court order to analyze grazing?

115-1 Since wildlife numbers and livestock AUMs are still such a big part of the RMP alternatives we feel that wildlife has been reduced disproportionately to livestock. For example even in the renewable resource alternative antelope numbers are proposed to be reduced and in no alternative are they increased. No reference is made to the fact that Colorado Division of Wildlife (CDOW) has reduced antelope objectives twice in the last five years. In considering the preferred alternative after range improvement projects are factored in livestock ends up with a two percent cut from preference while wildlife averages over a ten percent cut.

115-2 There is no discussion in the RMP of actual livestock use versus preference. We suspect that if the truth were known there is only enough production in most years to support actual use.

115-3 We are confused by the livestock figures presented in table 2-35. They do not reflect any numbers that we have discussed in the past nor are they the same as those in Table 5-1. Why are there two different tables with two different RMP levels for livestock?

115-4 We are also confused by the economic values that are used in table 4-20 for deer, elk and antelope. The unit values presented there are a small fraction of the actual values placed on them by the State of Colorado. We would appreciate some discussion of these values.

DEPARTMENT OF NATURAL RESOURCES, David H. Geisler, Executive Director • WILDLIFE COMMISSION, Timothy W. Schultz, Chairman  
James T. Smith, Vice Chairman • Richard Dreibelbis, Secretary • Donald A. Fernandez, Member • Rebecca L. Frank, Member  
Robert L. Friedenberg, Member • John Lay, Member • George VanDerBerg, Member

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Mr. Bill Pulford  
Page Two

April 29, 1986

Though our comments are critical of the Little Snake RMP the Division of Wildlife is still willing to work with BLM to try to resolve conflicts in the Little Snake Resource Area. If monitoring indicates that grazing needs to be reduced we want to be assured that the public values on the public lands are adequately considered.

Sincerely,

*[Signature]*  
Perry J. Olson  
Regional Manager

PDD:JM:ch

cc: Laurie Mathews

116

Montezuma Box 70  
Montezuma, CO  
80435

Dear Sirs:

116-1

I am writing to urge you to include the Cross Mountain area in your BLM wilderness proposal. This area is uniquely beautiful and provides habitat for many species of wildlife. Please consider including the area in your proposal.

Sincerely,

Mark A. Brown

117

117-1 I live in Craig and feel it would be very important to have Cross Mountain set aside as a wilderness area.

Sincerely,

C.J. Sorrentino

J.R. Shuckford

Jenny Johnson

Bill M. Mante

Judy D. Rafter

Duke Brown

Dane Smith

Honey Johnson

Jimmie Nelson-Shuckford

3839 EXMOORE CANYON

875 BRIDGE CIRCLE CANYON

778 S.M.V. CANYON

1045 CR 175 CANYON

550 2nd AVE W. CRAIG

625 PEARSON, CANYON

377 S.M.V. CANYON

1915 BAKER DR. CRAIG

825 BRIDGE, CANYON



Sierra Club

Rocky Mountain Chapter  
2339 East Colfax, #211  
Denver, CO 80206  
(303) 321-8292TO EXPLORE, ENJOY AND PRESERVE THE NATURAL  
FOREST, WATERS, WILDLIFE AND WILDERNESS

May 6, 1986  
William J. Pulford, District Manager  
Bureau of Land Management  
Craig District Office  
455 Emerson St.  
Craig, CO, 81625

Dear Mr. Pulford:

By this letter, I would like to offer two sets of comments on the Little Snake RMP/EIS one for myself, and the other for the Rocky Mountain Chapter of the Sierra Club. The Sierra Club comments are meant to supplement the much more extensive comments that you have already received from our Chapter Chairman, Mark Pearson.

Comments for the Rocky Mountain Chapter

These comments will deal mostly with the issues of water quality and soils, issues which the RMP/EIS makes clear are very crucial ones for the Craig District in general, and the Little Snake RA in particular because of the nature of the soils and climate. I am alarmed at the fact that soil condition and water quality are projected to decline, at least in the near to mid-term in all the alternatives. Particularly troubling is the projected increased salt load from run-off and from irrigation return flows. I was not able to discover in the document any succinct statement of what tonnage of salt the Little Snake and associated drainages on the western part of the RA contribute to the total salt load of the upper Colorado River Basin, nor any even rough projections of what impacts the various alternatives might have on this figure. It seems to me important to develop such an estimate, given the critical importance of salinity in the Colorado and its economic consequences.

118-1

Since the major thrust of this document seems to be the comparison of various renewable and non-renewable commodities with less tangible "outlets" like wilderness and wildlife (with the latter usually the loser), salinization is one area where economic comparisons can be made more concretely for purposes of economic tradeoffs. My suspicion is that were such a comparison made, then the small impacts of erosion control measures on grazing and oil/gas operations would show erosion control to be the winner.

2). Despite the above statement, the Preferred Alternative does seem to offer a number of mitigation measures designed to improve the condition of riparian zones and soils that can be supported as far as they go. The stream segments that are in particularly bad shape are identified, and concrete steps for improvement are outlined. However, in the PA, the BLM probably relies too much on monitoring studies to determine exactly what measures are to be implemented when. The problem with this is that it is very likely that BLM will never have enough money to do adequate monitoring of any of the resources that it manages. Therefore, the simplest approach consistent with actually doing something and with a constrained budget is a prescriptive one, i.e. all cattle should be kept out of the riparian zones of concern at all times, whether or not additional water supplies can be paid for from BLM's budget. It is the duty of BLM to protect streams more than it is its duty to provide water that the permittee should provide for himself. Similarly, all oil and gas operations should be kept out of riparian zones and fragile soil areas

118-2

printed on recycled paper

118

118 (2)

- altogether by NSO stipulations. If the oil/gas resource is sufficiently valuable then such stipulations are not a hindrance; if they are not yet that valuable, then BLM should wait until they are that valuable before leasing them. Clean water is a continuing, highly important export whose value should not be degraded for lesser resources.
- 3). In a similar way to oil/gas and grazing, the BLM should prohibit, rather than just restrict ORV use in areas of highly erodible soils. Restrictions are both harder to enforce and harder for the public to understand. Outright closure is simpler for everyone, if the BLM does not have the manpower to meaningfully enforce restrictions.
- 4). On p. 2-4) are outlined the various negative impacts of proposed forest harvests on water quality. Given the impacts described (and the description appears to be accurate), and the likely negligible value of the timber (if our experience with most Forest Service timber sales in Colorado is any indication), it seems most reasonable for the BLM to forgo harvesting this timber altogether.
- 5). The astonishing degree to which the BLM has relied on extrapolations of almost non-existent data on soil and other environmental conditions in this document makes me fear for the implementation of the Preferred Alternative. When the inevitable disputes arise about whether such and such an activity should be permitted in an area, the agency will not be very able to support its actions legally. It seems to me critical that the BLM put a greater percentage of its meager resources into surveys of range and riparian habitat condition.
- 6). In any discussion of alternative management scenarios, it is critical that one vital element, the agency's projected budget, be available to the reader. Neither the average citizen, nor, more importantly, members of Congress and their staffs who may read this document are given any idea whether the preferred alternative is only slightly more costly or simply "pie-in-the-sky" compared to Current Management. If the latter is true, then we can expect that the Current Management alternative will obtain, regardless of which one is formally chosen. All BLM plans that I have read are deficient in at least this one respect.
- 7). On p. 3-4 and elsewhere, the statement is made that wilderness designation would have an adverse effect on soil and water quality because damage due to grazing could not be mitigated by structural means! The logic is inverted. If the problem is over- or mis-grazing, then the solution is to reduce the allotment or direct the permittee to adopt more competent management, not blame wilderness for perpetrating the usual costly remedies.
- 8). Since the realities of the present Federal budget will likely result in a funding level comparable to the Current Management Alternative, how can BLM deal with some soils and water quality problems without spending a lot of money? The first thing, of course, is to reduce allotments and impose NSO stipulations on oil, gas and mineral leases. On a more positive note, the BLM could begin experimenting on a small scale with different grazing strategies that seem to have promise in the sort of "brittle" range environments that occur in the Little Snake RA; I'm referring, in particular to the methods espoused by the Holistic Resource Management organization with which I have passing familiarity. Secondly, as far as riparian habitat is concerned, BLM should look carefully and sympathetically at beaver introduction as a means of habitat restoration that requires relatively little manpower and money. Bruce Smith and his colleagues in the BLM in the Rock Springs District seem to have had some success at this in an area with climate and soils much like the Little Snake RA.
- To conclude this section, it is my opinion that the BLM has accurately enough described the general impacts of its alternatives on the environment. The bigger problems are less what needs to be done than what can be done with the money available and what policies will operate in allocating the monies.

## Personal Comments

As one who is personally familiar with the Cross Mountain and Diamond Breaks WSA's, I

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118-6

would like to praise the BLM's recommendation of the latter for wilderness (but with the restoration of the acreage in Utah), and condemn its non-wilderness recommendation for the former. Cross Mountain is undoubtedly a splendid wilderness candidate that will not be adequately protected by administrative means in the long run. The rationale offered for the Cross Mountain decision with its heavy emphasis on possible oil and gas resources at a very deep level strikes me as very far-fetched. Of course, the deeper the resource (presuming that it exists), the greater the opportunity for slant drilling when (if) the price is ever right. In addition, the natural values of the West Cold Spring Mountain WSA and the Vale of Tears WSA are also accurately described as substantial and deserve wilderness protection; a convincing case was not made for the importance of the supposed conflicts. Therefore, I believe that the BLM should reverse its recommendations for these areas in the FEIS and Plan.

I found it very hard to read this document and get a coherent story from it. Like most such plans, information is scattered about and disjointed and the language tends to be of the boiler-plate variety that discourages reading to begin with. One gets a poor feeling for the real decisions that the agency is faced with the issue of funds. In particular, needs a more direct discussion. One small exception to the rule as far as readability is concerned is the section on the social setting, p. 3-87-3-88. This I found to be interesting, even a little touching.

Thank you for your attention to the above comments and concerns.

Sincerely,

Kirk Cunningham  
Conservation Chairman  
Rocky Mountain Chapter  
Home Address  
680 Tantra Dr.  
Boulder, CO, 80303

P.S. Please put me on your mailing list for the final

119

YAMPA, COLORADO  
MAY 5, 1986

MR. WILLIAM J. PULFORD  
CRAIG DISTRICT MANAGER  
BUREAU OF LAND MANAGEMENT  
455 EMERSON  
CRAIG, COLORADO 81625

DEAR MR. PULFORD:

I AM WRITING IN REGARD TO THE RELEASE OF THE BUREAU OF LAND MANAGEMENT'S LITTLE SNAKE AREA RESOURCE MANAGEMENT PLAN RELEASED THIS SPRING. I TAKE STRONG EXCEPTION TO THE BUREAU'S FAILURE TO RECOMMEND ALL OF THE WSA'S SURROUNDING DINOSAUR NATIONAL MONUMENT FOR WILDERNESS DESIGNATION. IT IS DIFFICULT FOR ME TO UNDERSTAND HOW THE BUREAU CAN CONCLUDE THAT MINING AND LIVESTOCK VALUES OF THE WSA'S TAKE PRECEDENCE OVER THEIR WILDERNESS VALUES. I UNDERSTAND THAT LESS THAN FIVE PERCENT OF THE FEDERAL OIL AND GAS ACREAGE IN THE VICINITY IS CONTAINED IN THE WSA'S.

I AM FROM COLORADO, HAVE LIVED HERE MOST OF MY LIFE, AND HAVE VISITED MANY OF ITS WILDERNESS AREAS. NONE-THE-LESS, SOME OF MY MOST MEMORABLE "WILDERNESS" EXPERIENCES HAVE TAKEN PLACE IN EXTREME NORTHWESTERN COLORADO; IN THE AREA OF THE PROPOSED WILDERNESS STUDY AREAS. THE FEELING OF ISOLATION, PEACE, AND SOLITUDE ENJOYED THERE IS SIMPLY UNSURPASSED, IN MY EXPERIENCE. I HAVE, SEVERAL TIMES, ENJOYED ANTELOPE HUNTING IN NORTHWESTERN COLORADO. DURING THESE HUNTS I HAVE WITNESSED SOME RARE VIEWS OF WILDLIFE; REMARKABLE NUMBERS OF EAGLES, DEER, ANTELOPE, ETC. ONE ONE OCCASION I WAS FORTUNATE ENOUGH TO SEE DEER, ANTELOPE, AND ELK ON THE SAME HILLSIDE AT THE SAME TIME. MY COMPANIONS AND I REMARKED THAT IT WAS SOMETHING THE LIVES OF WHICH HADN'T BEEN SEEN SINCE LEWIS AND CLARK. IT WAS A SINGULARLY UNIQUE EXPERIENCE IN MY LIFE.

ON SUBSEQUENT VISITS TO THAT PART OF THE STATE, I HAVE BEEN ALARMED TO NOTE THAT THE GAME ANIMALS, THE ANTELOPE IN PARTICULAR, SEEM TO HAVE DECREASED DRASTICALLY IN NUMBERS. AND THOSE THAT REMAIN SEEM TO HAVE BECOME INCREASINGLY NERVOUS AND SKITTISH. I ATTRIBUTED THIS TO THE ACTIVITY OF SEISMIC CREWS ON THE VICINITY. ON SEVERAL OCCASIONS I WAS OBSERVING A GROUP OF ANTELOPE WHEN I HEARD THE EXPLOSIONS OF SEISMIC CREWS. THE HERDS OF ANTELOPE APPEARED TO PANIC; THEY BEGAN ACTING ALARMED AND BEGAN RUNNING AROUND AT RANDOM, WITH NO APPARENT PURPOSE TO THEIR MOVEMENTS. IT TOOK SOME TIME, A HALF HOUR OR MORE, FOR THEM TO CALM DOWN AND BEGIN FEEDING AGAIN.

DUE TO THE AVAILABILITY OF SUBSTANTIAL ACREAGE IN NORTHWESTERN COLORADO FOR MINING AND LIVESTOCK, AND DUE TO THE TRULY UNIQUE NATURE OF THE PROPOSED WSA'S, PARTICULARLY THE CROSS MOUNTAIN WSA, I WOULD HOPE THAT YOU, AND THE BUREAU, WOULD RECONSIDER YOUR DECISION, AND RECOMMEND ALL THE PROPOSED WSA'S SURROUNDING DINOSAUR NATIONAL MONUMENT FOR INCLUSION IN THE NATION'S WILDERNESS AREAS.

VERY TRULY YOURS,

THOMAS F. ROME

120

TRAPPER MINING INC.

May 5, 1986

Mr. William Pulford  
District Manager  
Bureau of Land Management  
Craig District Office  
455 Emerson St.  
Craig, CO 81625

Dear Bill:

I express my concern and that of the local farm and ranch community of the proposed Little Snake Resource Management Plan and Environmental Impact Statement. Past BLM management plans have strongly advocated the multi-use concept of resource management; this plan does not. The Little Snake RMP discusses multi-use objectives and the sustained yield capacity of the resources, however, I question the BLM's ability to maintain multiple use with the built-in inflexibility and constraints of this plan. The Bureau contends that future conflicts between resource users will be resolved in-house by taking into consideration the present staff's familiarity of the situation, common sense, and priority of land use. A primary concern is the long-range impacts of the RMP when the present staff is no longer in Craig and the common sense factor is no longer applicable because someone is interpreting the RMP as gospel. Please quantify how future issues will be resolved while advocating the multiple-use concept.

120-1

Secondly, the issue concerning the poor condition of native rangelands within the Little Snake Resource Area needs clarification. I have reviewed a variety of range inventories which were conducted by BLM Range Conservationists and find most rangelands to be in poor, low fair, or fair condition. I presume these same inventories were used in the RMP planning process. Most of the BLM inventories I reviewed were conducted during 1978-79 which were years preceded by significantly below-normal precipitation. My records show 1971, 1972, and 1974 were years of below normal precipitation. There is no record (National Weather Service) of precipitation amounts from January, 1975, to May, 1977, however, personal communications with local farmers and ranchers confirm below normal precipitation amounts. Having conducted similar range condition inventories on BLM lands and adjacent privately-owned lands (when I worked with the Soil Conservation Service) in 1983-84, my inventories concluded most rangeland within the Little Snake Resource Area were in high fair, good, and in several cases, excellent condition on site-specific basis. At the other extreme, my range inventories were conducted preceding several years of above-normal precipitation.

120-2

cont.

P.O. Box 187

Craig, Colorado 81626

(303) 824-4401

120

Mr. William Pulford  
Bureau of Land Management

2

May 5, 1986

120-2

I would conclude that if range condition was determined from inventories conducted in years following below-normal precipitation, then the condition and trend of the associated native plant communities is as much a reflection of adverse weather as it is livestock and/or wildlife use and is not representative of present range condition and trend.

Sincerely,

TRAPPER MINING INC.

William Agnew  
Environmental Engineer

WA/jb

121

4/2/66

Dear Sirs in audience:

You should change your decision to not designate the Ant Hills WSA wilderness. I have hiked this area twice (5/82, 5/84) and was overwhelmed by the quality of the wilderness experience, of which it was a part. These areas contain the single finest wilderness I have ever hiked. Flat that simple.

One rationale you offer for recommending non-designation is that "in and of itself it does not offer outstanding wilderness values". What legal basis is there for this (specifically)? It is contiguous with wilderness in Dinosaur National Monument and your own Chew Winter Camp WSA. How can you possibly separate these areas? Imaginary lines do not influence a wilderness experience or its quality.

121-1

You also rationalize your decision by stating "nor does this area add significantly to values within Dinosaur National Monument". Again, you are wrong. You (and the NPS) seem to believe the only wilderness experience to be gained in Dinosaur is along the Tropic River. As I mentioned, the wilderness experience in these uplands is fabulous and the Ant Hills WSA is a very important part of this because it provides a buffer between the road and the

121

canyon systems below. Otherwise, the canyons in Dinosaur would be overlooked. This area is an important wilderness and its small size is not relevant because it stands large means of wilderness. Record could decisions attest to this interpretation.

On page 2-54 you state "there are no outstanding or unique features within the WSA..." but though this is necessary to designate an area wilderness, there is no such requirement under the Wilderness Act, a wilderness area "may" contain these features, but it is not required. The Ant Hills

121-1

are quite interesting and appealing features of the landscape. In fact, what you have is an opportunity to designate a group of WSAs that would make an outstanding addition to the wilderness in Dinosaur. I have also hiked in the Potomac Drain and Dale of Teton WSAs and can attest to their wilderness character. You should choose the Combined WSAs alternative in your final statement. In all of these WSAs I feel wilderness values outweigh any other resource values, specifically minerals. I do congratulate you for recommending Dinosaur BLMs for wilderness designation. Finally, I have looked at

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numerous Draft and Final BLM environmental impact statements. Rarely, if ever, do you change your initial recommendations in the Final statement, despite overwhelming support for wilderness (in this case). Despite protestations to the contrary, the only conclusion I am left with is that you have already made up your mind and are simply fulfilling legal obligations. If true, that is a sad commentary on your decision making process. Suppose we (and many others) designate Ant Hills wilderness. Sincerely,

Bruce Pendley

Bruce Pendley  
39 1/2 W 100 N  
Ligon, UT  
84321

122

Washington  
12500 Canyon  
Garden, CO  
80503

William P. Baird  
BLM-Crested  
4355 Emerson St.  
Greeley, CO  
81625

Dear Sirs:

4/5/66

Please recommend

the 8 L. McSeab WSA's  
for inclusion in the NWPS.

122-1

Could least please make sure  
the Tropic, our last free flowing  
river, is protected, along with  
our Mts.

Thank you  
Jan Kempa



May 3, 1986

Gentlemen:

123-1

Constant assaults by the world of business into the wilderness have extremely deleterious effects upon humans! Certainly we like to drive cars and graze cattle, we want to USE the land for our benefit, but we must at some point stop and realize that the planet is finite, it's limited, and we must set parts of it aside, permanently, as wilderness, to be untouched save for footprints. What will this world be like with no animals? What will this world be like with no plants? Can you gentlemen see that there is little difference between whittling out wilderness areas down to nothing in the USA and the clear cutting of forests in the Amazon Basin? We are slowly choking this planet because we can't slow our consumption down. We've forgotten what safe yield really means. Please return wilderness designation to Cross Mountain! Please reduce the livestock grazing - its killing the west. Please help support wilderness for coloradans and thank you for helping keep Irish Canyon and Diamond Breaks as wild.

Sincerely,

John Covell

(This letter has been typed for reader clarity)

JOHN E. COVELL  
831 Grandview  
Boulder, Colorado 80302

May 5, 1986

Gentlemen.

Constant assaults by the world of business into the wilderness have extremely deleterious effects upon humans! Certainly we like to drive cars and graze cattle, we want to USE the land for our benefit, but we must at some point stop and realize that the planet is finite, it's limited, and we must set parts of it aside, permanently, as wilderness, to be untouched save for footprints. What will this world be like with no animals? What will this world be like with no plants? Can

you gentlemen see that there is little difference between whittling out wilderness areas down to nothing in the USA and the clear cutting of forests in the Amazon Basin? We are slowly choking this planet because we can't slow our consumption down. We've forgotten what safe yield really means. Please return wilderness designation to Cross Mountain! Please reduce the livestock grazing - its killing the west. Please help support wilderness for coloradans and thank you for helping keep Irish Canyon and Diamond Breaks as wild.

Sincerely,

John Covell

123

To The Bureau Of Land Management  
1 Roy Jackson, Craig Office.

We the undersigned Citizens with regard to possible closure of the Sand Wash Area in Moffat County, We would like to see this entire Area remain open to the public, for off Road Use and Recreational purposes. Thank You;

- ① Ireland, Paul 385 RUSSEL Craig
- ② J.B. Pfeiffer 1620 1/2 East 21st St. 40 Craig Co.
- ③ Joe Pfeiffer 470. 81621 CRAIG, CO 81625
- ④ G.A. Parate 35771 St Hwy 13 Craig Colo. 81625
- ⑤ H. H. H. 3370 Ridgeview Craig Co. 81625
- ⑥ Robert Clark Hamilton CO 81638
- ⑦ Richard Clark P.O. Box 387 Craig Co. 81625
- ⑧ Jack Pfeiffer 1501 132 Colorado 80467
- ⑨ Tom Pfeiffer Box 1469 Craig Co. 81625
- ⑩ Kenneth Clark 270 Hill Dr. Craig Co. 81625
- ⑪ Jack Pfeiffer 1501 132 Colorado 80467
- ⑫ Jack Pfeiffer 1501 132 Colorado 80467
- ⑬ Jack Pfeiffer 1501 132 Colorado 80467
- ⑭ Tom Pfeiffer Box 49 Haverhill Colo 81639
- ⑮ Tom Pfeiffer Box 77 Haverhill Colo 81639
- ⑯ Gregg Pfeiffer Box 1152 Craig Co. 81625
- ⑰ Richard Pfeiffer 351 Rose St. Craig Co. 81625
- ⑱ G.A. Pfeiffer 314 18th St. Kremmling Co 80459
- ⑲ Jack Pfeiffer 680 Ashley Road Craig Co. 81625
- ⑳ Jack Pfeiffer 5th Center St. Craig Co. 81625
- ㉑ Jack Pfeiffer 730 Eastview Craig Co. 81625
- ㉒ Paul Pfeiffer Box 2126 Steamboat Spr. Colo. 80427
- ㉓ Jack Pfeiffer Box 2126 Steamboat Spr. Co. 80427
- ㉔ Jack Pfeiffer 1501 132 Colorado 80467
- ㉕ Jack Pfeiffer 1501 132 Colorado 80467
- ㉖ Jack Pfeiffer 1501 132 Colorado 80467
- ㉗ Dan Pfeiffer 4800 Hwy 67 Craig Colo 81625
- ㉘ Mike Pfeiffer 3349 Ct Rd #14 Craig Colo 81625
- ㉙ Jack Pfeiffer 1430 Viewport #3 Craig Co. 81625
- ㉚ Jack Pfeiffer Box 771552 Steamboat Spr. Colo
- ㉛ Bob Pfeiffer 2210 W. 38th St. Craig Co.
- ㉜ Daniel R. Pfeiffer 347 33rd

We the undersigned Citizens with regard to possible closure of the Sand Wash Area in Moffat County, We would like to see this entire Area remain open to the public, For off Road Use and Recreational purposes. Thank You;

- 1 Bolt M. Lott 501 W 4th Craig, Co.
- 2 John J. Babb 292 S.M.K. Craig Co.
- 3 B.G. Babb 501 W. 9th St. Craig Colo.
- 4 Fred R. Lott 777 Stout CV-219, Co.
- 5 R. Lott 2979 prairie Craig, Co.
- 6 J. R. Lott 383 Russell, Craig
- 7 L. Decker 384 W 3rd Craig
- 8 Gary Johnsons PO Box 80 Craig
- 9 R. Lott 1. Home po Box 349 Hayden
- 10 L. Lott
- 11 Jim Galloway 851 Rose Craig
- 12 Tom D. Carr 624 Kennedy Red Spring Wyo.
- 13 Harold L. Lott 400 1st. Craig Colo.
- 14 Eddie Blair 433 Rose Craig Colo
- 15 R. Lott Craig Colo
- 16 L. Lott 748 Highland Dr. Craig Co.
- 17 L. Lott 748 Highland Dr. Craig Co.
- 18 L. Lott 219 Washington Craig Co.
- 19 L. Lott 38 m. N Craig Co.
- 20 L. Lott 778 Rose Craig, Co 81625
- 21 L. Lott 20. Box 421 R. Lott 41823
- 22 Albert L. Lott 801 1st. Craig Co 81625
- 23 Mike Schauder 1340 Barnard St. Craig, Co.
- 24 L. Lott 1294 Barclay Street Craig Co.
- 25 Arnold Bridger 778 Washington Craig Colo
- 26 L. Lott 575 Pamela Ln Steamboat Springs CO
- 27 L. Lott 905 School St Craig Co 81625
- 28 L. Lott 1000 School St Craig Co 81625
- 29 L. Lott 562 Stout Craig Colo.
- 30 Dorothy Lott 777 Ramsey Craig Colo.
- 31 L. Lott 777 Ramsey Craig Colo.
- 32 Robert C. Lott PO Box 1133 Craig Colo.



Amoco Production Company

General Reg. of  
P.O. Box 100  
Denver, Colorado 80231  
303-460-6000

Robert Anderson  
Public Lands Coordinator  
May 6, 1986

Mr. Duane Johnson  
Little Snake Resource Area  
Bureau of Land Management  
455 Emerson  
Craig, CO 81625

Dear Duane:

Amoco Production Company is a subsidiary of Amoco Corporation. Its Denver Region is charged with the responsibility for finding and producing oil and gas in the western United States. We are very interested in the Little Snake RA, and appreciate the opportunity to comment on the draft Resource Management Plan and Environmental Impact Statement.

125-1 Perhaps the most important question which must be answered in the Final RMP is how to avoid overstepping federal authority on spill-estate lands where the surface is private. It is extremely important that BLM not independently move to manage surface uses where the federal minerals are leased. The maintenance of private rights, including the right of a surface owner to contract independently with the mineral lessee, is critical both in principle and as a practical matter.

The Little Snake RA is a prolific producer of oil, gas, and other minerals. We hope that, as frequently as possible, energy exploration and development can be accomplished through performance standards and cooperative agreements.

125-2 In Chapter 2, page 2-11, it would be helpful for BLM to explain the differences between Research Natural Areas and Outstanding Natural Areas, especially with respect to oil and gas leasing. We note oil and gas leasing and development are compatible uses in RNAs and excluded uses in ONAs. In view of the temporary nature and environmental compatibility of oil and gas activity, it is our strong belief that leasing and development should be listed as compatible uses for both.

125-3 It is also important, where oil and gas activity is restricted by avoidance stipulations near remnant vegetation associations, that grazing be regulated as well. If protection of these remnant vegetation associations is the management objective, it's certain that the only protective control that will work over the long term is grazing management for both wildlife and domestic livestock.

125-4 The discussion of the effects of oil and gas development on wildlife habitat (pp. 4-24, 4-25) is exaggerated, and could result in unjustified tension among

Mr. Duane Johnson

-2-

125 May 6, 1986

125-4 The readers of this RPS. Too much is left unsaid as to the exact disposition of the animals involved. The projected layers of development, as defined here, would indicate that drilling operations affect more wild animals than hunting. Temporary displacement is one thing; permanent herd loss is quite another. Some additional explanation is necessary to bring this section into perspective and to modify the inflammatory language.

125-5 BLM indicates in the document that energy and mineral evaluations were conducted for the entire resource area (Appendix 3). However, a summation of the evaluations is provided only for areas proposed for special management. The public needs to have general information about the areas with moderate to high potential for recoverable oil and gas, and to know BLM carefully considered this potential in resolving conflicts and analyzing tradeoffs.

125-6 Amoco doesn't believe new leases in recreation priority areas need NSO stipulations attached. Under the multiple-use management concept, both interim and long-term activities can coexist. Energy exploration does not destroy recreation opportunity, and that implication should not be made in this document.

We appreciate the effort that has gone into the preparation of this document. Thank you again for the opportunity to comment.

Sincerely yours,

*Robert Anderson*  
R. Anderson

RLA:sd

DEPARTMENT OF GEOGRAPHY  
UNIVERSITY OF WISCONSIN - MADISON

MMB Science Hall  
Madison, WI 53706  
608-262-7178

May 2, 1986

William J. Pulford  
District Manager-Craig District  
Bureau of Land Management  
455 Emerson St.  
Craig, Colorado 81625

Dear Mr. Pulford,

I would like to comment on the Draft Little Snake Resource Management Plan. Please print my comments in your final RMP/EIS.

In general, BLM is to be commended for a very thorough consideration of Special Management Areas. These areas, as you know, are of critical importance to science. I support designation of all 13 proposed areas. Other means, such as "avoidance stipulations" will not be adequate to perpetuate the irreplaceable scientific value of these sites. Particularly troublesome is, what must be, the inadvertent omission of Vermilion Creek RNA and Ace in the Hole Draw RNA from your Preferred Alternative.

As you know, I have published several scientific papers on Colorado vegetation, including one now in press (Great Basin Naturalist-1986) on the unique vegetation in the Little Snake Resource Area, and I was part of the Colorado Natural Heritage Inventory's 1983 inventory in the Resource Area, conducted under contract with the BLM. I have spent the last 10 years inventorying and evaluating the significance of natural vegetation in the western United States.

BLM has made a serious oversight in excluding Vermilion Creek RNA and Ace in the Hole Draw RNA from designation. Your descriptions of the significance of these sites in Appendix 22 indicates they are the best remaining areas for plant associations that are "critically imperiled worldwide." These two very critical sites total only 480 acres, representing .04% of the Resource Area.

Every successful corporation in America reinvests 6% or more of gross profits into research and development. The Preferred Alternative in the Draft RMP would dedicate only 2000 acres, or .12% of the Resource Area strictly for research. Designation of Vermilion Creek RNA and Ace in the Hole Draw RNA would increase this to only .16% of the Resource Area. Designated research sites would then include Ink Springs RNA, Limestone Ridge RNA, Vermilion Creek RNA, and Ace in the Hole Draw RNA. These four sites would adequately protect the most critically imperiled plant associations in the Resource Area. While additional SNAs would have research values, only Research Natural Areas provide the long-term guarantee of security necessary to perpetuate their scientific values. BLM has the opportunity to achieve this long-term protection by RNA designation at the cost of excluding commodity use on an area that amounts to a pittance of the Resource Area.

Research conducted on Research Natural Areas has provided direct long-term benefit to commodity users in improvements in grazing methods, control of weeds and poisonous plants, and breeding stock for revegetation of mined lands. These

small areas also perpetuate the genetic stock we need for breeding programs to improve forage quality, and the drought and insect resistance needed in our native range plants.

I cannot emphasize too strongly that continuation of current management practices or application of "avoidance stipulations" would be inadequate to protect the scientific value of these four proposed RMA's. Scientific areas are needed where all human activities are excluded, whether good or bad. Good livestock management practices may maintain the forage on these sites, and "avoidance stipulations" may minimize the effects of road construction or mining, but sites are needed where none of these activities occur, if we are to be able to have a baseline research site for comparative studies.

I believe the economic loss to commodity users would be rather small if all four sites were designated. But, I fully encourage BLM to compensate landowners and others affected by designation of SMA's by providing alternative forage and/or increased range improvements on other allotments.

Considering the possible long-term benefits to all of us, and the relatively low cost, BLM cannot afford to pass up the opportunity to formally designate Ink Springs RMA, Limestone Ridge RMA, Vermilion Creek RMA, and Ace in the Hole RMA. I'm confident that BLM can designate these four critical sites without serious effect on commodity users, landowners, and residents, by providing creative alternatives. I encourage BLM to work with the Colorado Natural Areas Program and The Nature Conservancy, agencies with proven records in this area, to achieve designation without affecting current users.

Sincerely,

*William L. Baker*

William L. Baker  
PMB Candidate

cc: Colorado Natural Areas Program  
The Nature Conservancy



Rocky Mountain  
Oil & Gas Association, Inc.

345 PETROLEUM BUILDING • DENVER, COLORADO 80202  
303/534-8281

May 5, 1986

Mr. Duane Johnson  
Program Manager  
Little Snake Resource Area  
Bureau of Land Management  
455 Emerson  
Craig, CO 81625

Dear Mr. Johnson:

On behalf of the Rocky Mountain Oil and Gas Association (RMOGA), I would like to express our thanks for meeting with us to discuss the Draft Little Snake Resource Management Plan. The meeting was valuable because it provided a direct link of communication between industry and the BLM. For your information RMOGA is a trade association representing hundreds of members who account for more than 90 percent of the oil and gas exploration, production, and transportation activities in the Rocky Mountain West. Because of this, our members have a vital interest in how the Bureau of Land Management manages its lands, particularly with respect to mineral resource activities.

The following represents the concerns raised at our meeting.

On Page 2-61, Preferred Alternative, BLM indicates, "Oil and gas and other minerals would be made available for leasing and development consistent with protection of other resource values." While we agree that BLM is responsible for managing all resources and ensuring their protection from undue degradation, the BLM is also charged with preparing a tradeoff analysis to determine the highest and best use of the land. This analysis is required in the BLM's Supplemental Program Guidance for Resource Management Planning. We do not see evidence of BLM's utilization of these guidelines in the Little Snake Resource Area planning documents. We suggest that the BLM at a minimum summarize

127-1

May 5, 1986

Mr. Duane Johnson  
Program Manager  
Little Snake Resource Area  
Page 2

the process used to arrive at the land management decisions contained in the Draft Environmental Impact Statement when it is finalized.

127-2

We are strongly opposed to the Craig District's proposal for Federal Mineral Constraint Areas. This classification is entirely inappropriate for normal lands not bound by statutes which are held privately. Under what authority can the BLM justify the designation of these areas? Unless these lands are subject to specific statutes, such as the Endangered Species Act or are classified as having historical significance, the manner in which the landowner decides to use his lands is his business alone. Moreover, this policy is in direct conflict with policies set forth in the Colorado BLM State Office as reflected in other Colorado RMPs as well as national policy and implies a bias against oil and gas activities. Furthermore, the BLM has not provided an analysis of the energy and mineral potential of these lands nor the acreage involved. As you know from our meeting, the concept of Federal Mineral Constraint Areas will surely be challenged by members of the private sector as well as by industry.

127-3

On Page 4-86 of the planning document, the statement that withdrawal from all leaseable mineral development would be desirable in the special recreation management areas or portions of these areas is not justifiable. Industry has proved numerous times that its operations are compatible with other sensitive uses and needs. Of particular concern is the BLM's statement, "When it is necessary to close access to public lands for the development of federal resources, the loss of public access would be compensated for by opening private lands held by the company developing the federal resources for public recreation." Under what authority can the BLM require such an opening of privately held land? BLM lands are subject to multiple use management, which provides for numerous uses to occur on federal lands simultaneously. We are unaware of any statutes or regulations which require replacement of lands being utilized for a certain resource use in order to provide access for recreational or any other use. The Federal government certainly does not provide additional land for energy and mineral exploration and development when Federal lands are placed in a restrictive land-use classification such as wilderness, ACECs, RMAs, etc. It is our opinion that this replacement concept is ripe for challenge and we support BLM's position that this is not a viable mitigation

127-4

127-5

May 5, 1986

Mr. Duane Johnson  
Program Manager  
Little Snake Resource Area  
Page 3

measure. We suggest that any problems relating to public access being denied by a particular company be resolved on an individual basis.

127-5

It is ludicrous that BLM is proposing surface restrictions for certain special management areas in terms of oil and gas activities when livestock grazing will be permitted. One of the primary reasons for designating many of these areas is rare vegetation "remnants". The term remnant implies that this rare vegetation is sparse as well as sporadically located. How does the BLM plan to protect these remnants? If a fence is constructed to keep out livestock, a fence would suffice to protect the plants from oil and gas activities; therefore, blanket NSO stipulations would not be required. Furthermore, some of these Special Management Areas fall within the boundaries of KCS and existing oil and gas units. Yet, there is no indication in the plan as to the types of tradeoffs discussed when these areas were decided upon. All of the proposed special management areas contain moderate to high potential for oil and gas. Therefore, oil and gas activities should be considered of primary importance and minimally restricted by standard stipulations.

127-6

We believe that the discussion of oil and gas development on pages 4-24 and 4-25 of the Environmental Consequences section, are greatly exaggerated. The implication that oil and gas company employees would be solely responsible for major increases in "harassment, poaching, and road kills" in areas which experience exploration and development activities is a serious and unjustifiable accusation. Furthermore, we don't believe that these activities can only be associated with oil and gas activities. The BLM must justify this statement with hard facts. Additionally, we note that no discussion is included as to the same types of impacts occurring as a result of increased recreational uses. We believe that these accusations accompanied by the fact that the oil industry is singled out on this issue implies a bias against oil and gas activities.

127-7

We understand that BLM is making an effort to identify all the impacts which could possibly result from oil and gas activities. Nevertheless, most energy company personnel are sensitive to wildlife considerations and make an effort to minimize these types of problems. Furthermore, we believe that BLM must be fair in its assessment of the impacts and include the other resource uses which could have a similar

May 5, 1986

Mr. Duane Johnson  
Program Manager  
Little Snake Resource Area

Page 4

impact on wildlife resources.

127-8 Furthermore, we find it hard to believe that one well in the White River Resource Area caused the direct loss of 50 percent of the mule deer population in the area. BLM has not specified whether the deer were killed or whether they actually moved to another winter range location. In most cases wildlife species merely move to an undisturbed portion of winter range during activities and return when human activities cease. This hardly constitutes a major impact or loss. It is our opinion that this example is unfounded and should be removed from the discussion entirely.

127-9 BLM has indicated that all new leases issued in recreation priority areas would have NSO stipulations attached. Blanket NSO stipulations are unnecessary. Energy and mineral activities should be allowed without surface limitations in general. These activities should be monitored and controlled on a site-specific basis through the use of reasonable stipulations or performance standards and only in areas which are developed recreation sites or intensively used sites. The same guidelines outlined for livestock grazing in recreation areas should be applied to oil and gas activities.

127-10 With regard to rights-of-way, we believe that performance standards should be utilized rather than blanket restrictions. Further, BLM should clarify in the plan that where valid existing rights are held in areas proposed for special management new rights-of-way will not be prohibited.

127-11 On page 4-8 the BLM identifies lands which will be subject to no lease decisions or no surface occupancy stipulations. This Table 4-2 is severely lacking in that it does not provide information regarding the potential of these lands in terms of energy and mineral resources. Further, it does not identify how access would be impacted through an overlap of these stipulations. We recommend that the planners for the Little Snake RMP review the Grand Junction RMP to learn what types of information should be included in this discussion as required by the fluid mineral leasing guidelines contained in the BLM's Supplemental Program Guidance for Planning.

The BLM indicates that energy and mineral evaluations were conducted for the entire resource area in Appendix J. However, a summation of these evaluations is provided only

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May 5, 1986

Mr. Duane Johnson  
Program Manager  
Little Snake Resource Area

Page 5

127-12 for areas proposed for special management. The public has the right, as well as the need, to know which lands in the resource area contain significant potential for oil and gas resources. It is our suggestion that a map be included in the final plan denoting the mineral potential of the resource area.

Please feel free to contact me if you have any questions regarding these comments. We would be happy to discuss them with you.

Sincerely,  
*Alfred I. Freil*  
Alfred I. Freil  
Public Lands Director

127



M. M. Fleische  
State Attorney  
Legislative and Regulatory Affairs

Chevron U.S.A. Inc.  
700 South Colorado Blvd., P.O. Box 589, Denver, CO 80201

May 6, 1986

Little Snake Draft RMP/EIS

Mr. Duane Johnson  
Little Snake RMP Project Manager  
BLM Craig District Office  
453 Emerson Street  
Craig, Colorado 81625

Dear Duane:

Thank you for meeting with the industry representatives at RMOGA's office last week. We are very concerned about your plan, and I believe that such meetings are the most efficient mode for achieving a better understanding of each other's perspectives and positions. Chevron's main concerns with your draft RMP are as follows.

127-1 First, as we discussed in our meeting, we believe that your use of Federal Mineral

128-2 subject to this proposal, nor has an analysis of the oil and gas potential of these lands been conducted.

128-3 Second, on Page 4-86, we were concerned about the statement whereby the loss of public access for the development of federal resources would be compensated for by opening that resource company's private lands. We support your decision to exclude this concept from the final plan.

128-4 Third, you have indicated that all new leases in fragile soil and watershed areas as well as in recreation priority areas would have NSO stipulations attached. We believe that companies should be given the opportunity to operate in those areas with performance standards or reasonable stipulations and that the NSO stipulations should be allowed to be waived if appropriate. We want the opportunity to show that we can mitigate adverse impacts related to our operations.

128-5 Fourth, we are befuddled by your use of blanket NSO stipulations in order to protect rare vegetation "remnants", and yet livestock would be permitted to graze in remnant areas. There must be other adequate ways to protect these remnants without imposing NSO stipulations.

128

-2-

128-6 Fifth, pursuant to our discussion at the meeting, we believe that Pages 4-24 and 4-25 of the Environmental Consequences section are misleading, unfair, and should be rewritten.

128-7 Sixth, performance standards should also be applied to major rights-of-way instead of blanket restrictions. It needs to be clearly stated that where valid existing rights are held in special management areas, new rights-of-way will not be prohibited.

128-8 Seventh, as we all agreed, Table 4-2 on Page 4-8 needs to be expanded to show the mineral potential for the entire resource area, not just for the special management areas.

Thank you again for meeting with us, and we request that you incorporate our concerns into the final draft.

Sincerely yours,  
*M. M. Fleische*  
M. M. Fleische

MMF:ed

128

May 6, 1986

William J. Palford  
Craig District Manager, BLM  
456 Emerson St.  
Craig, Co 81625

"We like, we telephone-pole, we billboard,  
we bulldoze, we doom the very things which  
urged us here; beauty and space and  
nature's truth." - Glenda Swannow, Odillac  
Cowboys, 1985

Dear Mr. Palford,

I was alarmed, saddened and ungrateful  
to learn of the decision of the B.L.M. not to  
recommmend Cross Mountain for wilderness  
designation. In the two visits I have made  
to this area in the past year, I was  
astounded and thrilled with the natural  
spectacle here. I am dismayed that a  
remote possibility of oil and gas potential should  
jeopardize the existence and preservation of  
Cross Mountain. I strongly request and  
support reconsideration on the part of the BLM.  
With the current stockpiles of oil, it seems prudent  
to start saving those irreplaceable resources that provide  
personal recreative energy.

129-1

Bureau of Land Management  
Wilderness Coordinator  
455 Emerson St.  
Craig, Co 81625

D.R. Helm  
9776 Hilldale Dr  
Morrison, Co 80465

Gentlemen;

I am writing in regards to Ant Hills and Chew Winter Camp wilderness study  
areas. I am strongly in favor of wilderness designation of the Ant Hills  
area. I and my wife have been through the Ant Hills twice (1982, 1983) to  
visit and camp on the north rim of the Vampa canyon. The Ant Hills is a  
beautiful and pristine area bordering one of the most magnificent sandstone  
canyon areas in Colorado. I feel this area should be protected as a buffer  
and entrance way to the canyons, as it lies so close to the actual canyon  
rim.

Furthermore, I do not understand, even after phone calls, why there is a  
dividing line between Chew Winter Camp study area and the Ant Hills area.  
This area should be included with the Ant Hills and designated for the  
same reasons.

I hope this letter has some bearing on the decision making. To often I see  
in wilderness proceedings, tens of pro-wilderness letters having an effect  
on the final decision. Why are inputs asked for if in the end they have no  
bearing on the managers decision? This process seem to be overlooked for  
other interests. I feel stronger considerations should be given to the  
interests of the public.

Sincerely;

*Douglas and Catherine Helm*  
Douglas and Catherine Helm

I appreciate your recognition of the  
values of Cross Mountain. I would hope  
that future generations would be guaranteed  
that same recognition.

Thank you very much.

Respectfully Submitted,

Teresa L. Hart M.D.  
Box 1 Box 1064  
Animato Colorado 8120

DEAR SIR,

I'm writing concerning the WSA governing  
the ~~Ant Hills~~ Chew Winter Camp and the  
Ant Hills area directly contiguous to it. I've  
been through the Ant Hills on a backpack  
trip to the Dinosaur Nat. Monument, and  
feel it should belong as part of the great  
wilderness included with the Dinosaur area.  
They should not be separated, no matter how  
small an island Ant Hills may be within all the  
other wilderness its boundaries touch. I also  
would like to hear a legal case for excepting the  
Ant Hills from the Chew Winter Camp WSA.

131-1

Respectfully,  
Dorothy D. Kelly  
Boulder, CO 80501

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6774 Powell Road  
Parker, Colorado 80134  
May 5, 1986

William J. Pulford  
District Manager  
Bureau of Land Management  
Craig District Office  
455 Emerson Street  
Craig, Colorado 81625

Dear Mr. Pulford:

I have reviewed the Little Snake Resource Management Plan and Environmental Impact Statement. I have also read the Wilderness Technical Supplement to the above. I wish to make the following comments.

I support the Natural Environment Alternative that would recommend 90,957 acres in 8 Wilderness Study Areas as suitable for designation.

I feel the Preferred Alternative inadequately addresses the issue of wilderness protection.

The 8 Wilderness Study Areas encompass nearly 91,000 acres. The BLM has recommended only one area of 36,000 acres as suitable for wilderness.

I feel the Cross Mountain WSA, an area of 14,081 acres that contains some of the most stunning ecologically diverse country in northwest Colorado is worthy of wilderness protection. The BLM speculates that there is moderate to high potential for oil and gas. The agency apparently ignores at least 3 dry holes recently drilled around the mountain.

132-1

The BLM states in the Wilderness Technical Supplement that outstanding opportunities exist for solitude of primitive and unconfined recreation. Unique recreation opportunities include kayaking and bighorn sheep hunting. They also state the canyon has sheer vertical walls and is of geologic interest. Bighorn sheep and threatened and endangered fish are present.

I urge the BLM to recommend wilderness protection West Cold Spring. This area comprises less than 1 percent of the total available mineral acreage in the vicinity.

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William J. Pulford  
Bureau of Land Management  
Page 2  
May 5, 1986

132-1

The BLM states in the Wilderness Technical Supplement that "draws and canyons provide opportunities for isolation. The rugged terrain provides excellent opportunities for primitive recreation". The BLM says special features of West Cold Springs is Beaver Creek which is unique in northwest Colorado because it is the only perennial stream with public access that supports cutthroat trout population. It is also crucial habitat for bighorn sheep and the WSA is within a Colorado Division of Wildlife's Quality Elk Management Area.

I support wilderness designation for the 5 WSAs that border Dinosaur National Monument. These areas would topographically complete the boundaries of the National Monument. The BLM has failed to make these recommendations.

I commend the BLM for their recommendation of wilderness protection for the Diamond Breaks WSA. I support designation of Irish Canyon as an Area of Critical Environmental Concern and Limestone Ridge as a Research Natural Area.

In closing I feel the Draft Plan falls short in protecting a small part of Craig District BLM land that contains outstanding wilderness characteristics for this and future generations of Americans to enjoy and for protection of critical wildlife habitat. I strongly urge the Craig District to improve the Plan by recommending 7 more WSAs for permanent protection in the Final Plan.

Very truly yours,

*Lawrence A. Papp*  
Lawrence A. Papp

133

## SPORTS COMMITTEE DISTRICT



**President**  
JAMES H. HOPKINS  
NATURAL RESOURCES CENTER  
20300 130th  
P.O. BOX 130  
P.O. BOX 130  
P.O. BOX 130

**Vice President**  
JAMES H. HOPKINS  
NATURAL RESOURCES CENTER  
20300 130th  
P.O. BOX 130  
P.O. BOX 130  
P.O. BOX 130

**Secretary**  
JAMES H. HOPKINS  
NATURAL RESOURCES CENTER  
20300 130th  
P.O. BOX 130  
P.O. BOX 130  
P.O. BOX 130

**Treasurer**  
JAMES H. HOPKINS  
NATURAL RESOURCES CENTER  
20300 130th  
P.O. BOX 130  
P.O. BOX 130  
P.O. BOX 130

**Referee**  
JAMES H. HOPKINS  
NATURAL RESOURCES CENTER  
20300 130th  
P.O. BOX 130  
P.O. BOX 130  
P.O. BOX 130

**AMA Coordinator & District Legislative Officer**  
JAMES H. HOPKINS  
NATURAL RESOURCES CENTER  
20300 130th  
P.O. BOX 130  
P.O. BOX 130  
P.O. BOX 130

**Legal Defense & Land Use Chairman**  
JAMES H. HOPKINS  
NATURAL RESOURCES CENTER  
20300 130th  
P.O. BOX 130  
P.O. BOX 130  
P.O. BOX 130

**AMA Trustee S.W. Region & D-37 Congressman**  
JAMES H. HOPKINS  
NATURAL RESOURCES CENTER  
20300 130th  
P.O. BOX 130  
P.O. BOX 130  
P.O. BOX 130

**D-37 AMA Congressman**  
JAMES H. HOPKINS  
NATURAL RESOURCES CENTER  
20300 130th  
P.O. BOX 130  
P.O. BOX 130  
P.O. BOX 130

**AMA National Office**  
JAMES H. HOPKINS  
NATURAL RESOURCES CENTER  
20300 130th  
P.O. BOX 130  
P.O. BOX 130  
P.O. BOX 130

**Memberships**  
JAMES H. HOPKINS  
NATURAL RESOURCES CENTER  
20300 130th  
P.O. BOX 130  
P.O. BOX 130  
P.O. BOX 130

William J. Pulford  
Manager, Craig District  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

AMA, INC.

April 22, 1986

Dear Mr. Pulford,

Sports Committee District 37, AMA, Inc., wishes to thank you for the opportunity to comment on the Little Snake Resource Management Plan. District 37 has entered into this comment phase at the request of a motorcyclist who resides in Craig, CO.

District 37 has been involved with the California Desert Plan since its inception. We feel that we have been instrumental in developing the Plan in regards to ORV use, particularly, motorcycle sports. District 37 is very active in promoting all types of off road events.

Therefore, we were contacted to help in the promotion of an event around Craig. As we became involved, we were made aware that there was a draft plan in the comment period. We requested a copy and here we are.

We will start by making some generic overview comments on the Plan as a whole. Then we will get to specific issues.

We must take two perspectives throughout our comments. First, we have to look at the Plan as a promoter of motorcycle events. The event will, by its nature, cause more intensive use than trail riding. What may be unacceptable impacts were a race to occur, may be well within acceptable limits for casual use. Moreover, different types of events will cause different levels of impacts.

On the following pages you will find our comments. We hope they are constructive. We further hope that we can assist in resolving conflict that will occur.

Sincerely,  
*Richard A. Papp*  
Legislative Officer



133

SPORTS COMMITTEE DISTRICT 37, AMA, INC.  
COMMENTS ON LITTLE SNAKE RMP/DEIS  
Prepared by Rick Hammel, DLO

### OVERVIEW

At first glance, this document appears to be quite complete, particularly in the average reader. However, there are some conceptual omissions in relation to Off Road Vehicles (ORV).

While on the surface, many uses appear to be in conflict. However, these competing uses can co-exist. Various users have had to learn to respect the existence of other users. Once that respect has been established, there is harmony. An example is the Barstow to Vegas Motorcycle Race. We use a haul road to connect to segments of the race course. The next day it is graded by us. The minor is happy and we are happy. I won't argue that it will be easy. Prejudices will have to be overcome. This philosophy is not only for ORV users, but all users where conflict exists.

### COMMENTS ON THE ISSUES

**ISSUE 2:**  
1.(f)(iv.) There will always be conflicts between users on this issue. The only hope for the BLM is to attempt to mitigate the issues as best possible.

133-1

**ISSUE 3:**  
ADD. Identify various recreational needs by the public, both local and regional. Develop a comprehensive management plan, encompassing various forms of recreation. Develop a plan to help mitigate conflicts between other users.  
While many forms of recreation require facilities, there are a few who want none. ORV use is one. There appears to be an interest in motorcycle racing, both enduros and loop type desert racing. Spectator interest is low and participant needs are usually served by the use of self-contained camping equipment.

**NOTE:** A plan, that I have sketched above, needs to address ORV competition. Of particular concern, mitigating possibilities. Let's say that there are two segments of a course that are desirable and have no environmental concerns. However, there is a cultural site in the way of connecting them. How would this problem be mitigated so that the event could occur? We have used ribboned 40 foot wide corridors to do just this type of mitigation. Another example is we needed to go around some arch sites in a WSA. A race, being a "temporary action", can occur in a WSA. (This is in accordance with BLM and affirmed by U.S. Ninth Circuit of Appeals. Sierra Club vs BLM and Sports Committee, District 37, AMA, Inc., 1985) We picked an area that was fairly sparse and established a corridor. This particular action was challenged in court. The judge, A. Wallace Tashiro, COO, affirmed the BLM's action.

The point being, that a trail may be established by an "authorized officer". Moreover, a plan that spells out the rules will help the BLM and the public for years to come.

#### COMMENTS ON MANAGEMENT ALTERNATIVES

- 133-2** Management Priority Areas: There should be reference made to seasonal priorities. An area could support grazing in the winter. However, as the grasses and the soils dry, this area can support OHV activity. Other forms of recreation would then move into the area in the fall.
- 133-3** Definitions: Soils and Water Resources. Restrictions on OHV Use would be as I outlined above. Impacts created by different types of OHV vary greatly.
- 133-4** Nature/History. Under excluded uses, the recreation exclusion is a balanced concept and provides a good measure of resource protection.
- Resource Specific Guidance: Recreation (Issue 3-3). The State of California Off Highway Vehicle Commission has instituted a state wide trail signing system. BLM may wish to establish this system nationwide.
- OHV Designations (Issue 3-4). Acceptable.
- Alternatives Considered: We concur with the BLM on the Preferred Alternative. The other alternatives have merit, however, the Preferred best serves the public as a whole.

#### SUMMARY

- This RMP is well done, and comprehensive. I wish that the California Desert Plan was as well done as this.
- 133-5** There is only one area of real concern. There is no way to amend this plan. There should be a plan amendment process where the BLM and the public may make amendments to enhance the plan. The California Desert Plan has a very workable model. Note also there is no plan as to how the Advisory Counsel operates.
- 133-6** Last, the BLM should establish a volunteer program with various user groups to maintain and enhance resources. This is returning what you use.

1800 Hatcher  
Ann Arbor, MI 48103  
May 2, 1986

William J. Pullford  
District Manager  
Craig District  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

Dear Mr. Pullford:

I would like to comment on the draft Little Snake Resource Management Plan.

I strongly support the BLM's proposal to protect Irish Canyon and Hells Canyon as Areas of Critical Environmental Concern (ACECs). I also strongly support the proposal to recommend the Diamond Breaks WSA for wilderness designation. Unfortunately, there is little else I can find in the RMP that I can support.

The BLM's recommendation of non-wilderness for the Cross Mountain, West Cold Spring, Vale of Tears, Ant Hills, Chew Winter Camp, Peterson Draw and Tepee Draw areas is outrageous and totally unjustified. The minimal protection for part of Cross Mountain proposed by the BLM as a "recreation management area" is grossly inadequate, and unacceptable. The justifications used for non-wilderness are extremely weak, and place the desire of a few to exploit the non-renewable resources on our public lands over the desire of the vast majority of the public for long-term resource protection. The BLM should recommend all WSA's in the Little Snake Resource Area for wilderness designation in the Final RMP.

**134-1**

**134-2**

**134-3**

The Little Yampa Canyon, between Craig and Maybell, was not considered in the RMP as a potential Wild and Scenic River. This, despite the fact that the National Park Service identified this stretch of river as qualifying for such protection. This lack of consideration by the BLM is unreasonable, and unjustified. Little Yampa Canyon should be considered for protection as a Wild and Scenic River in the Final RMP.

At least a third of the range in Little Snake Resource Area is in unsatisfactory condition, and another third is in an "unknown"

- 134-3** condition. This indicates a gross failure on the part of the BLM to protect our land resources from overuse and abuse by some livestock grazers. The BLM proposes to compound the problem by failing to implement any reduction in grazing until further studies are done. Livestock grazing should be reduced immediately on lands where range conditions are unsatisfactory. On lands where existing information on range condition is "unknown", every effort should be made to gather necessary data as soon as possible; until adequate data are available, if there is significant reason to believe that conditions are unacceptable, grazing should be reduced until adequate data are gathered. This should be reflected in the Final RMP.
- 134-4**

Almost ninety percent of the Resource Area would be designated "open" in the proposed RMP. It is ludicrous to expect that allowing ORV's to have free range over almost the entire area will not cause serious, long-term environmental damage. It is also totally unreasonable to expect the BLM staff to be able to regulate ORV use over an area of over one million acres. The BLM should acknowledge that the use of ORV's off designated roads is anti-multiple-use, and that it degrades virtually all other resource values. ORV's should be banned in the Little Snake Resource Area, except for the use of licensed vehicles on roads. The Final RMP should reflect this.

Thank you for the opportunity to provide input on the draft Little Snake Resource Management Plan. I hope you will seriously consider my comments, and will incorporate them in the final plan.

Sincerely,

Michael J. Kellett

Eldon Kinney  
President, Timberline Trailriders, Inc.  
P.O. Box 1794  
Steamboat Springs, CO 80427  
May 6, 1986

Mr. Duane Johnson  
Program Manager  
Bureau of Land Management  
Craig District Office  
455 Emerson  
Craig, CO 81625

Dear Mr. Johnson:

This letter is in regard to proposed off-road closures and restrictions in your area in Northwest Colorado.

As President of the Timberline Trailriders, Inc., a motorcycle club consisting of members from Steamboat Springs, Hayden and Craig, I can speak for the club concerning this matter. We are very much opposed to any off-road vehicle closures. Northwest Colorado is one of the few remaining areas where motorcyclists can ride with few restrictions. Most of the members of our club have been riding in the Sandwash, Maybell area for 15 to 20 years, and would hate to see any of this area closed.

Thank you for this opportunity to comment.

Sincerely,

Eldon Kinney

May 6, 1986

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, Colorado 81625

Re: Resource Management Plan for Little Snake Resource Area

Please include this letter in the hearing record.

Dear Mr. Pulford:

In this letter I wish to comment on the wilderness recommendations within the Little Snake Resource Area.

First, I must compliment the BLM for its recommendation of the Diamond Breaks area for wilderness designation, as well as for its designation of Irish Canyon as an "Area of Critical Environmental Concern."

I am, however, taken aback by the BLM exclusion of the Cross Mountain area from a wilderness designation. This exclusion is reminiscent of the miniscule wilderness recommendations of recent years in the Glenwood Springs Resource Area, the White River Wilderness Study Areas, and the San Juan/San Miguel Resource Management Plan.

The Cross Mountain area would contribute various features to the country's existing wilderness inventory which are currently underrepresented. It possesses unusual ecosystem diversity for lands in northwest Colorado; threatened or endangered species such as peregrine falcons and bald eagles find refuge at Cross Mountain.

I do not find compelling the BLM rationale that Cross Mountain possesses moderate-to-high potential for oil and gas reserves. Recent drilling around the mountain has produced nothing and there is an extensive amount of federal land nearby which can be explored for gas and oil. Why deprive the relatively small Cross Mountain area of wilderness protection? Protecting it only as a recreation management area invites intrusions.

Surely you must know that of all the BLM land in Colorado, less than 10% has wilderness characteristics--only about 1% of the total land area of the state. Colorado will probably be reaching the carrying capacity of its existing wilderness in 25 to 30 years. Since roughly 65% of the public lands in the U.S. remain open for mineral development, why use mineral development as an excuse not only to deny Cross Mountain a wilderness designation, but also Cold Springs Mountain (with its abundance of wildlife) and the Dinosaur Adjacent Areas?

Cross Mountain, Cold Springs Mountain and the Dinosaur Adjacent Areas should be given wilderness protection. In this time of budget cuts, wilderness management is probably the least expensive and the easiest option.

Sincerely,  
*Robert E. Schreiner, Jr.*  
Robert E. Schreiner, Jr.  
1440 N. Quincy Ave.  
Englewood, CO 80110

Overall only one of the alternatives in this study represents any facsimile of multiple use planning, the Natural Environment alternative. I support this alternative. The other alternatives and particularly your preferred alternative, are so bias toward development interests that they can neither be considered balance nor equitable. In no way do the recommendations in the Natural Environment seem extremely conservationist minded, but they are the best recommendations being offered in this management plan. At least the Natural Environment alternative offers some protection for the areas you identify as having unique, fragile or valuable natural attributes throughout this document. Under this alternative most of the area would still be wide open to oil and gas leasing, coal leasing, minerals, livestock grazing, ORV use and other exploitive activities. 95% of the resource area would still be open to oil and gas leasing with some restrictions imposed. 64% of the area would remain totally open to ORV use. 26% would have limited ORV use and only 10% would be closed to ORV use. 344,500 acres in the area would be acceptable for coal leasing under this Natural Environment alternative. This alternative does attempt to protect the few areas which you have identified as being environmentally unique or fragile, including all the WSA's in the area and all the Special Management Area candidates. The Natural Environment alternative seems to describe the absolute minimum protection necessary and is the only alternative that represents somewhat balanced land use management. Given the range of alternatives in this RMP I question whether or not a good decision can be made. Your range of alternatives is very narrow and limited.

The Preferred Alternative with which you plan to manage our public lands is unfair, biased and imbalance. The prevailing BLM bias toward exploitative, consumptive activities on the public lands is very evident in this Preferred alternative. In an area where wilderness resources are indeed scarce you only recommend 31,490 acres for wilderness, out of the small total of 90,987 acres which have been identified as qualifying for wilderness designation. At the same time you are recommending 1,875,000 acres for oil and gas leasing. In fact West Cold Springs WSA was found unsuitable because this humongous amount of 0 & 9 acreage was not enough. I think this is just ludicrous.

Unfortunately the unsuitability recommendation for Cross Mountain WSA seems even worse.

May 5 1986  
Carl P. Petersen  
Grand Jct. CO

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
Craig Colorado

Dear Sir:

The following letter is being submitted as public comment on the Little Snake RMP/EIS. Thank you for considering such public comment during your planning process. I have lived in western Colorado all of my life and I have been actively involved in this and other land use planning processes over the years. I believe our public lands are the richest and most valuable part of the unique heritage we enjoy by being Americans. Your decision concerning bar land should be of importance to every person.

I would first like to commend you on the decisions that were made during this planning process which will enhance and protect unique and valuable aspects of the natural environment. The most obvious of these decisions include the wilderness suitability recommendation for Diamond Breaks, the designation of Limestone Ridge RMA, Irish Canyon and Lookout Mountain AGCAs. Overall your recommendations concerning wildlife are good although they would be much better with more wilderness suitability recommendations and more special management area designations. These designations would also protect the rare plants and plant groupings you list in the special management section in the appendix of the RMP. Also commendable is your concern and recognition of potential damage to fragile soils. Soil Conservation has not been given enough emphasis in other areas here in Colorado. Recreational designation for Little Yampa/Juiper Canyon is better than no protection but an OMA designation seems better. At least until Congress gets around to declaring these river sections as study rivers under the Wild and Scenic Rivers Act. You did not deal with the wild and scenic attributes of this river section in the RMP. I find that strange since a wild or scenic or recreational river section would certainly affect the planning for the river and river corridor. The National Park Service has already recognized the worthiness of this river section for study. Recreational management for Cedar Mountain seems like an appropriate designation considering the environmental educational opportunities present. Both Cross Mountain and West Cold Spring would be better managed by congressional wilderness designations than any administratively imposed SMA designation you are now recommending.

#### West Cold Springs

There are zero pre-PLPMA leases in the West Cold Springs WSA. This indicates that the area, as you state, has "good" manageability (S-3 wilderness technical supplement). Your study states that wilderness designation would have a positive effect on visual resources, primitive recreation, water resources, soils and wildlife as well as wilderness values. Special features exist in this WSA including crucial habitat for big horn sheep, good cultural resource potential, a cutthroat trout stream and trophy elk. While it may be possible to protect the wildlife resources through other management methods too many other resources, including most importantly the wilderness values, would be lost.

The 12 post-PLPMA leases in the area can hardly be so valuable, in a resource area with 1,364,000 other acres which are open to oil and gas activity, that they would preclude the wilderness values and all the other associated values you have recognized. I cannot see, from reviewing the wilderness supplement now you can logically arrive at a non suitable recommendation for West Cold Springs.

#### Cross Mountain

137-2

You should really be proud of yourself for the non suitable recommendation for Cross Mountain WSA. Your study points out numerous fine wilderness attributes in the area. In fact Cross Mountain seems to contain every wilderness criteria imaginable and more. You are more familiar with the recreational values, wildlife values, including 1 and 2 species habitat, ecological diversity, geological uniqueness, (a superimposed mountain), cultural resources and sheer beauty, in this area than I am. You point them all out in the wilderness technical supplement. Your recommendation for such a spectacular area as non suitable for wilderness is just a shame. Administrative protections are too openminded to be trusted with the protection of this area. If Cross Mountain cannot get a suitable recommendation for wilderness, imagine how suspicious the other recommendations seem for this RA and others around the state. The attitude that any number of wilderness, recreational or wildlife resources should be sacrificed for a few oil and gas wells is just ridiculous. Oil and gas resources are available on nearly 2 million other acres in this RA. It is questionable if oil and gas resources even exist in this area. Limestone mining is undoubtedly available in other areas where the impacted would not be so immense.



WSAs adjacent to Dinosaur National Monument

- Not only did you come up with a blanket non suitable recommendation for all 5 of these areas, you are now recommending that they be utilized for mineral development, O&G leasing, and forestry. These roadless areas adjacent to a National Monument should have other uses more appropriate to maintaining the integrity of the area. Even without being declared wilderness other uses such as wildlife, recreation, livestock grazing and maintenance of the visual resource seem to be higher and better uses. From various overlooks in Dinosaur these areas are visible. This visual aspect should be considered and development should which would change the integrity of the monument should be forgone. By looking at the topographical maps of the area these small WSAs would make good natural boundaries for Dinosaur replacing the unrealistic ruler lines now used as boundaries. These areas would also be added to the Congressionally designated wilderness study area boundaries inside the park. These boundary enhancements should be of prime consideration before dropping these areas from any further wilderness considerations.

Livestock Grazing

- The last point I would like to submit concerning this RMP/EIS deals with livestock grazing. I simply would like to know why you are not doing something about the unsatisfactory range conditions which exist on at least 1/3 of the RA? If you find the conditions unsatisfactory why don't you reduce the AUMs until the range recovers? It certainly seems that there will not be funds available to monitor the range adequately in the near future or for further study. But if you already have information that indicates an unsatisfactory condition then take the grazing pressure off or at least reduce it until the condition of the range becomes satisfactory.

Thank you for considering these comments. I certainly hope your final RMP/EIS incorporates major changes which will help to balance the use of our public lands and promote good multiple use. You should be more realistically protecting all of our natural heritage and not just trying to promote exploitation.

Sincerely, *Paul T. Petersen*  
Paul T. Petersen  
Grand Jct. Colorado

May 1, 1980

Dear Sirs,  
Bureau of Land Management  
P.O. Box 1177  
Monte Vista, CO 81457

I made oral comments concerning the Little Snake Resource Management Plan and the Wilderness Technical Supplement in Grand Junction, CO March 17, 1980 and would like to expand upon these with some written comments. These comments will only address the wilderness Technical Supplement.

I was born and raised in the Little Snake Resource Area and have lived in both the western and eastern parts of it. As I hope to continue to live here my concerns for the area are strong and real.

1. I strongly agree with the proposed breaks WSA wilderness recommendation, and use the recommended boundaries.

2. I strongly disagree with the No wilderness recommendation for the Cross Mountain WSA. I have hiked and backpacked in this WSA numerous times during the past eight years and believe it to be exceptionally suitable for wilderness classification. It is also in need of legislative rather than the proposed administrative protection.

3. In both chapters 2 and 3 the suitability of the area for wilderness classification is noted. The WSA is said to meet more than most all criteria of wilderness characteristics. b. The area is noted in the study as containing "a number of special features"

that "greatly enhance the wilderness values of the Mountain" (3-44). These include geological, wildlife, botanic, aquatic, scenic and cultural features.

c. It is noted on page 3-54 that the primary reason for the partial local sentiment against wilderness designation is due to support for a proposed yet presently dead dam and reservoir at the site. Yet the study acknowledges that wilderness designation does not preclude such a dam in the future.

d. The summarized rationale for the proposed alternative is that administrative protection would protect the wilderness qualities of the WSA "while allowing potential oil and gas development" (5-5). Yet there are no known deposits in the WSA and while the potential is high that some do occur their location is unknown. If these potential resources are the primary reason to not give legislative protection how secure can future administrative protection be should deposits be found either in the proposed ACEC or SRMA. Such a possibility is noted in chapter 4 and the administrative protection is acknowledged to be of limited effectiveness in such a case. It concludes that "therefore, although actual surface disturbance would be relatively small, such development would cause an irretrievable loss of all wilderness values throughout much of the WSA" (4-24). This demonstrates

138-1

that the very reason for the withholding of legislative protection should instead be the reason to seek that protection.

In conclusion I feel that since the Cross Mountain WSA is known to be extremely fit for wilderness designation, would increase diversity and geographic distribution within the Wilderness System, and has a fairly high possibility of being altered in such ways as to destroy much of its unique and valuable characteristics, that to withhold wilderness protection due to potential oil and gas reserves and limited local support for a dead dam proposal is very foolhardy. Any loss of oil and gas due to wilderness designation would be relatively miniscule on the national scale, the loss of local employment also negligible, and the national and local gain by the preservation of the beautiful mountain would continue to grow.

138-1

3. I also feel that the Preferred Alternative for the West Cold Spring WSA fails to adequately protect this WSA. My reasons are much the same as for Cross Mountain. Again, the suitability for wilderness designation is noted. Again the reasons for withholding protection are the very ones necessitating protection. It is also acknowledged that only "limited inventory work" (3-23) was conducted within the WSA.

Thank you for your consideration of these comments.

Sincerely,  
Don Randolph

WRITTEN TESTIMONY  
OF  
RONALD MCCLINTOCK  
LITTLE SNAKE RESOURCE AREA  
IMPACT MAP AND ALTERNATIVE RECOMMENDATIONS

10, 1986  
Denver

(To be included in the Public Record)

My name is Ronald McClintock and I live at 485 Marine Street, Boulder, Colorado. I moved to Colorado 16 years ago which statistically speaking, probably makes me something of an old-timer. I have been following the BLM planning process since 1981, as a volunteer with GWSA, Sierra Club and the Wilderness Society.

#### PG. 141

In general, I felt that the RFA presented factual material in a way that was conducive to informed decision-making. For example, the division of alternatives in the Little Snake RFA into four priority areas was clearer than in others where only two major alternatives are presented (in addition to the preferred).

I further felt that the distinction between the Energy and Minerals and Commodity Production, and between Renewable Resources and Natural Environment helped the reader identify and compare the baseline data which would achieve maximum goals in these particular areas.

However, it seemed that the range of choices within these alternatives was too small, not allowing for genuine choice between significantly distinct futures for the region. This was true for each resource category. For example the difference in oil and gas leasing acreage between the Energy and Mineral Alt. (1.1 million) and the Natural Environment Alternative (1 million) is an insignificant margin of difference to allow for real choice. Also, 1 million acre of oil and gas leasing are still too many for an alternative which would truly protect the natural environment.

139-1

139-2

I also noticed throughout the RFA several statements to the effect that resources had not been studied enough to form a basis for decision-making. Several critical resources appeared to have been inadequately inventoried: range conditions, wildlife habitat (p. 3-43), raptors, songbirds, game species, endangered species, and species dependent on riparian habitat. This makes it difficult to know if your recommended protections for these resources are adequate. I was disappointed at finding no archeological protection plan in the RFA and would hope that a separate document, outlining plans for protection of archeological resources, will soon be forthcoming so that important resources not be at risk due to lack of such.

139-3

I wonder if we are seeing here the effects of the priority shifts instituted in the BLM early in the 80's. Budget cuts and agency personnel reassignments, attrition, and transfers, can be an effective in shifting management from resource protection to resource development, as any overt policy change.

Finally, regarding general and comments, I also noticed a tendency in the Little Snake RFA, that I have seen in other RFA's in Colorado, to emphasize intensive management of soils, watersheds, and water quality, timber, natural features, wildlife habitat, forage, seemingly as a way to compensate for the intensive development of the resource area also being proposed in the preferred alternative.

While I support much of the proposed resource restoration and enhancement outlined in the Renewable Resource and Preferred Alternatives, I am afraid that these may be unrealistic in light of budget cutbacks we are facing in areas of natural resource conservation. If in fact the budget necessary to implement these glowing promises doesn't materialize, then the proposed improvements will have been merely a palliative, designed to make the significant mineral, grazing, and timber

development appear more palatable, without ever coming to pass.

Better would be a provision in the RFA that each of the destructive development being recommended in the Preferred Alternative is conditional on there being funding available for mitigation of the adverse impacts of such development.

#### COAL, OIL & GAS

Getting down to specific resource recommendations, I am concerned about the high level of coal leasing in all alternatives, especially considering the current slump in the coal market and the fact that, according to report, the Regional Coal Team recently recommended no new coal leasing in this region. This, together with the fact that this document is subject to revision in another decade and can easily adjust its coal leasing levels should economic conditions improve, makes me wonder why coal leasing levels are higher than any immediate demand could possibly warrant.

139-4

This same argument applies to the large amount of acreage allocated to O & G leasing, which likewise forecloses long-term natural values (soil, vegetation, wildlife) for the sake of uncertain present gain. Oil and gas leasing in sensitive areas should be used as a last resort, if and when Arab oil sources become unavailable and after renewable energy resources have been more fully explored, rather than made available for indiscriminate development. Any plan to deliberately destroy irreplaceable resources before we know we have to.

139-5

Considering the soft market for both O & G and for coal I do not understand why the Preferred Alternative chose leasing levels closer to the Energy and Minerals Alternative rather than to the Natural Environment Alternative, especially since

the RHP states later on that the Natural Environment Alternative would still allow adequate supplies of existing and future mineral leases to meet increased in market demand.

Similarly, the RHP states on page 4-5 that the more protective restrictions placed on coal leasing in the Natural Environment Alternative, will not hinder coal production. In that case why not go for the protection?

Specifically I would like to see no coal leasing in recreation and wildlife priority areas, for example the Her Mountain Coal Tract and Little Yampa Canyon recreation area.

139-6 Further regarding coal and oil and gas leasing, the RHP needs to document for purposes of disclosure and completing the economic picture, the ~~139-6~~ ~~139-6~~ of extracting the proposed volumes of coal and oil and gas, as well as government costs incurred in such production.

#### WILDLIFE

Regarding wildlife, especially raptorial species, I feel that the emphasis on mineral and energy development in the Preferred Alternative does not adequately address the importance of maintaining habitat vital to these species. As stated in the RHP, the resource area contains habitat crucial to many species of land animals, birds and fish, now crowded more and more by cumulative impacts throughout the region from housing and mineral development, grazing and water pollution.

Aliparian areas under BLM management are scattered sparsely across the arid landscape of this region and constitute the only safe havens for migratory water fowl and other specialized forms of wildlife. Therefore, the BLM has primary responsibility to ensure that these areas under its jurisdiction do not lose their ability to sustain these fragile wildlife populations. Unlike livestock and energy, these species, once gone, cannot be replaced.

#### SPECIAL DESIGNATIONS

139-8 The biggest oversight in the RHP regarding recommended protection for rare and endangered plant species, archeological sites, and historic and scenic areas is the omission of Beaver Creek on the west side of Mt. Cold Springs Mountain. Appropriate protective status, whether RARE, OSA, or RMA, for this unique area with outstanding wildlife and natural values, needs to be included in the final RHP.

Another serious omission is Hells Canyon which should likewise be included in the final RHP on the RMA list.

In general I believe the RHP is too lax in providing protection for areas of critical environmental concern on public lands (see attached New York Times article), as demonstrated by the fact that the Preferred Alternative fails to protect all such areas in the resource area. G-Map, Horse Draw, and Ink Springs need special protection in the final RHP, for a total of four RARE's, 2 RMA's, and 3 OSA rather than only 3 RARE's and 1 RMA, as recommended in the current Preferred Alternative.

139-9 Also all areas so designated need to have No Surface Occupancy stipulations to ensure long-term protection.

#### GRAZING

The draft RHP does not adequately balance grazing with other uses, giving precedence to this activity at the expense of wildlife and soil resources. Projected range improvement levels in the Preferred Alternative are not acceptable and need to be changed to those in the Natural Environment Alternative. Where financially feasible, land treatment should be combined with adjusting grazing preference and grazing restrictions, to bring range and forage conditions back to healthy levels.

Only 294 ranchers in the resource area use public lands and of those only 28 depend on BLM forage for more than 50% of their forage. Economic advantage of so few does not compensate for the irretrievable loss of range viability. The interests of both can be served by the kind of enlightened stewardship now being experimented with on a cooperative basis between the BLM and concerned ranchers elsewhere in the rocky

#### WILDERNESS

Wilderness recommendation for all 2 alternatives would, in my opinion, be a recent gesture toward preserving a few remnants of the native ecosystem, considering the small amount of acreage in the resource area with wilderness potential, relative to the overall area left open for development.

The most glaring omission, however, is Cross Mountain, whose negative recommendation seems to contradict the highly favorable language describing the wilderness attributes of the area. This inconsistency between the analysis of wilderness potential of the area and the final recommendation, was reminiscent of the Bill Wilson, Willow Creek and Shell Creek recommendations and gives the impression that higher management is dictating decisions to the study team, possibly according to some kind of quota system.

139-7 Cross Mountain was recommended for wilderness in three out of four alternatives. Yet, the RHP in its Preferred Alternative, chose to follow the Energy and Minerals Alternative in rejecting Cross Mountain for wilderness.

Special RHP designation for Cross Mountain is no substitute for legislative protection for this truly remarkable piece of geology, and unique wildlife preserve. Having visited Cross Mountain with my family, it would seem most inappropriate to leave this area open to oil and gas development, especially when a high percentage of the underlying oil and gas deposits can be tapped in the surrounding area and the oil field is of marginal economic value.

Under the criteria that "wilderness areas with high potential to attract recreation visitors could be recommended for designation".

#### Mountain Region.

139-10 Another recommendation that should be avoided as stated in 139-10 controlling cattle grazing in wildlife areas, where water tanks and salt licks can do the job.

#### WILD AND SCENIC RIVER RECOMMENDATION

139-11 I strongly recommend that the Little Snake resource area study the Little Yampa River Canyon as part of the RHP. This stretch of the Yampa River between Craig and Daguerl has been identified by the National Park Service as deserving wild and scenic river status. At the very least the BLM should conduct a study of its wild and scenic potential.

#### SOILS

"Demand and Dependency" on soil is significant, as the RHP states on page 3-49. While I commend the RHP for its proposed watershed rehabilitation projects and salinity control recommendations under the Preferred Alternative, I feel they do not go far enough considering the underlying importance of this resource, and are also subject to being cut depending on availability of future funding.

139-12 If rehabilitation funding assumed in these soil protection measures at some point is not forthcoming, then the damaging mineral and other development which will further erode fragile soils in the region, should correspondingly be reduced.

No Surface Occupancy for steep slopes should be instituted also to avoid soil erosion. All soil protection stipulations in renewable resource and Natural Environment Alternatives need to be included in the Preferred Alternative.

#### TIMBER PRODUCTION

The Natural Environment Alternative is, in our opinion, the best because "intensive management practices" of timber would only be allowed in special areas, rather than being relatively uncontrolled as in the Preferred Alternative.

139-13 Also fuelwood demand projections need to include the effects of possible woodsmoke pollution control ordinances which,

139-13 according to current trends in Colorado, may also affect the Little Snake Resource Area in the future.

139-14 We were pleased to see that GNV use is reduced in all alternatives. However, why does the preferred Alternative recommend the highest acreages of GNV use, second only to the Commodity Production Alternative (p. 8-10)?

139-15 RGV Corridors  
RGV restrictions are not comprehensive enough. In particular they need to include RGA's. RGV corridors also need to be coordinated with corridors designated in neighboring RGA's, to avoid uncoordinated planning of future utility and pipelines.

#### GENERAL STATEMENT OF RGA'S

I appreciated the fact that the Little Snake RGA, perhaps more than some other RGA's statewide, acknowledged the increasing desires of public human users who depend on public lands for other than consumptive uses and that the RGA even attempted to derive economic values from their activities. The RGA is involved in a delicate balancing act in attempting to define conflicting demands objectively.

It is caught between pressure for development coming locally from the bottom up and from the administration, from the top down. It is also caught between a past which has relied primarily on extractive industries and grazing, and a future which many feel will tend more toward recreation and tourism as an economic base.

139-16 I would like to question an assumption, implied during the RGA's brief venture into philosophical speculation on page 3-95, that somehow local economic needs and the larger societal need to preserve resources are incompatible. Local communities throughout Colorado are finding that recreation can provide both a more

environmentally sound and economically stable source of revenue than traditional economic activities. Recreation is the second largest source of revenue statewide and may look larger in the Craig area economy as time goes on. And within the recreation industry, non-organized forms of recreation, such as hunting and hiking compete well economically with more developed forms, such as hunting and GNV use, as the chart on page 3 - 7 indicates.

The RGA could further the recreation potential of the Little Snake Resource Area by placing more emphasis in the final RGA on resource protection, and deemphasizing the more unstable and environmentally destructive economic activities. By upgrading browse and big game habitat more than has proposed, by active restoration of trout fisheries and other recreation enhancing activities, the RGA could go far toward relieving harmony between local and "societal interests".

To quote a variation in the high country news "In the West the time is ripe for a major economic shift. The decline of mining, ranching, oil and gas drilling and of power plant has created a partial economic vacuum. It is at least conceivable that extractive development which destroy the land could be replaced by economies which maintain or enhance the land."

In this RGA, I would like to see the RGA take more leadership in this direction.

Thank you for this opportunity to comment. I appreciate your coming all the way to Denver to listen to those of us here who take an interest in the Little Snake Resource Area.

Robert McEllen

Duane Johnson - Program Manager  
Bureau of Land Management, Craig District  
435 Emerson  
Craig, Colorado 81625

May 6, 1985

RE: Draft Management Plan

Dear Mr. Johnson

140-1 It has been brought to my attention that the Ant Hills area immediately north of Dinosaur National Monument is not being considered as an addition to any roadless area in wilderness. Having walked through the area on route to the north rim of Dinosaur I would personally highly recommend the addition of this area to a roadless/wilderness unit. The area ecologically and geographically complements the adjacent National Monument which more than deserves a buffer zone.

Sincerely,

Paul Krehbacher

Reclamation Specialist - State of Colorado  
2882 Calhoun Ave.  
Grand Jct., Colorado  
81503



May 8, 1985

Department of Interior  
Bureau of Land Management  
Craig District Office  
Little Snake River Resource Area  
250 Industrial Ave.  
Craig, Colorado 81625

Dear Sirs:

The Moffat County Commissioners would like to address the Little Snake Resource Management Plan. We have written several residents of Moffat County and asked for their input. We, as Moffat County Commissioners, feel we speak for the people of Moffat County. We are elected directly by the people and feel we speak for, if not all, a good percentage of the people in Moffat County.

141-1 The first item in your BMP that we would like to address is the wilderness areas. First, West Cold Springs, in listing your criteria, you admit there are several impacts left by man. There are several roads in the area. A good share of the area is close enough to Colorado 119 to hear the noise of trucks and cars. We don't feel this offers a true wilderness area. You also state there are draws and canyons that provide isolation. We submit that in the western states there are thousands of draws and canyons that offer isolation. Also, in your West Cold Springs comments, you say that Beaver Creek is unique in Northwest Colorado because it is the only stream with public access that supports cutthroat trout population. This is not true. There are several creeks in the Williams Fork drainage, Sapona Creek, Silver Creek and South Fork of the Williams Fork, that have cutthroat trout available. This area is open because it is in the national forest. We also think this would be a hard area to manage. We feel the cost of control would be extensive.

141-2 At Cross Mountain, we don't feel the naturalness of Cross Mountain is any more spectacular than several other canyons located in the western United States. There are also many roads that have infringed on this area. There is a potential area for limestone mining in the north end of the canyon. We feel this should be kept open. Big Horn sheep hunting, that you mention, is doubtful at best. The sheep are controlled by the Colorado Department of Wildlife. Big Horn sheep hunting is very limited. Also you list your endangered species. I am sure you are overabundant in this part of the country, you always list the peregrine and prairie falcon, but you always say "many". We don't feel there are any confirmed sightings of either of these birds in that particular area. We

#### COMMISSIONERS

221 West Victory Way  
Craig, Colorado 81625  
824 5517

Thomas F. Johnson  
District 1

Albert Gamble  
District 2

Dan Clifton  
District 3

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- 141-2 Do not believe these should be included unless you have proof the bird is nesting in the area.

We feel the people of Northwest Colorado, as well as many other people in the state of Colorado, would like to see the Cross-Mountain area remain as it is today. The kayakers talked about using trail area, but the canyon is such to rough at high water for anybody to traverse in a kayak, or any other boat. The only time they can traverse the river at all is at low water. In fact, at high water time, it is very dangerous and over the last several years the Sheriff of Moffat County has closed the Yampa River to all boating in that area. We feel this area should be kept over for oil and gas exploration.

We attended a hearing in the Moffat County Courthouse in 1984 and listened to the testimony given. Most of those testifying for the wilderness area at Cross Mountain were not Moffat County residents. The testimony for the area to become a Wilderness Area came from residents from Routt County. These same Routt County residents are skiers. It seems odd they can take bulldozers up the sides of mountains, punt over trees, slash them, burn them, run off the wild game and generally tear up the terrain just so they can ski in the winter time. It seems strange to us they are opposed to any sort of development that doesn't fit in with exactly what they want. These people live to ski in the winter and kayak in the summer. Anything that doesn't agree with that, they are generally opposed to.

- 141-3 We do not feel the Little Yampa, Juniper Canyon area should be included as a special recreation management area. People of this area for years have planned and fought for a dam built in Juniper Canyon. We feel the BLM is well aware of this fact and should take it into consideration. The majority of the people of Moffat County, and probably a majority of the people in Northwest Colorado, prefer a dam be built in that area. The dam has been planned for a number of years and the Moffat County Commissioners feel the time is right to develop the dam. We would see that the Yampa River, along with Juniper Canyon remain as it is today, under a multiple use situation. In increasing this, you mention that twenty-seven (27) mile stretch of the river from Williams Fork to the west side of Duffy Mountain is becoming increasingly popular for those floating the river, we disagree. The river is seldom used. The river is used exactly from the Hayden area to the bridge south of Craig for boat trips. The reason for this is the section of the river from Hayden to Craig contains fairly good trout and pike fishing.

- 141-4 Once the river leaves Craig, it mostly contains suckers, some cat fish and occasional pike. We do not believe the river has been used as you indicate on table 319 in the Little Snake Resource Management Plan.

You state the Yampa River has attained state wide and regional significance because of its recreational opportunities and generally natural environment. The national significance of this river is based on the fact that eight-three (83) miles from its confluence with the Williams River, to the confluence of the Little Snake River is listed on the National Park Service National Wild River Inventory List.

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We do not believe, and feel the facts prove the Yampa River does not fit as a wild and scenic river. There is too much development in that area. There is a railroad that runs beside the river from approximately the bridge south of Craig to the confluence of the Williams Fork. There are numerous power lines. There is a good share of irrigated land that continues into Grand Park. The river also carries to much sediment to meet the qualifications for a wild and scenic river.

We disagree with the economic value of recreation in the Little Snake Resource Area. Under float boating and other boating, on recreation visitors day, you list 45,000 visitors days. Most of these days are spent floating through Dinosaur National Monument. At one time Craig had a large company involved in transporting people through Dinosaur National Monument. We feel this is where these figures came from. At the present time, this company is no longer in business. We do not believe there is a commercial carrier left in Moffat County to take people through Dinosaur National Monument on the river. Also, on Page 3-7, the statement follows: "BLM plays a large role in supplying recreational resources in Moffat County and in Routt County. Winter activities and hunting, head the list of activities providing employment and income in Routt County. Hunting and float boating are major activities contributed in Moffat County's economy." We do not know where this idea came from. As we stated earlier, there are no float boating firms left in Moffat County. They have moved out and have not been replaced. We assume float boating in Moffat County today is almost nonexistent as far as helping the economy of Moffat County.

141-5

In reading through both the Wilderness Technical Supplement to the Little Snake and the Little Snake Resource Management Plan Environmental Impact Statement, we find most of your information, particularly about Moffat County, to be outdated. It was collected at a time when Moffat County still had an impact from power plants south of Craig. We do not believe the figures contained in either statement are good figures for Moffat County today. We feel if you want a true and accurate picture, you need to update your information contained in both studies to reflect what is actually happening in Moffat County in 1985.

141-6

To emphasize our statement, we feel the people of Moffat County and Northwest Colorado would rather see a dam built on the Yampa River than anything else. We are including in our statement to you, a partial listing of signatures that were collected on petitions. The petitions were circulated for approximately one week. Over 3,000 signatures were collected in one week time to back Juniper Cross Mountain Dam. We feel this is significant in that it proves a good share of the people in Northwest Colorado would rather see a dam built on the Yampa River than to have the Yampa River restricted for development.

We believe the BLM, as much as the County, is charged with insuring the use of all public lands be available to all of the American public and that the

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lands be used for the highest and best use. We believe the highest and best use of these lands is to keep them in their current multiple use category. Maintaining the multiple use category will insure all lands be used for whatever the highest and best use of the said lands dictates, whether it dictates farming, drilling, mining, hunting, fishing or other outdoor recreation demands.

It is our contention there is already more than sufficient acres of Colorado land designated as wilderness, why needlessly add more? Moffat County is close to several hundred thousand acres of wilderness land located in the national forests.

We believe the BLM has sufficient regulations at hand which will guarantee the preservation of subject lands for future generations without going to such extremes. We believe to place any of these areas into a wilderness designation will ultimately be beneficial to very few and will be very detrimental to the majority of the people in Moffat County as well as the United States.

We would next like to address some issues on the Range Management Plan. As set forth, we feel the Range Management Plan would seriously injure producers in our area. We feel people are well aware of the fact. At this time ranchers and farmers alike are having serious problems trying to maintain. With thousands of today's ranchers going broke across our country, we feel it is a very bad time to put more restrictions where these people are trying to operate their livestock businesses. We feel wildlife and livestock numbers should be made proportionately equal. We feel the Department of Wildlife should be held more accountable for the number of wildlife they are trying to run on any particular range. In your study you go back over a five year period of time to do the study with some of the factors of wildlife. We believe that in a short five year period this puts these numbers disproportionately high. Had you used a database over a twenty year period, we feel the average might have been substantially lower and more truly reflect the number of wildlife over the last period of time.

141-7

We feel the Department of Wildlife has tried to carry too many animals on too little range. We feel this was proven only three years ago when, with a severe winter, thousands of antelope, deer and elk died. Without the efforts of local citizens in Moffat County, many more thousands would have died. The Department of Wildlife takes a posture they should keep building the herds as large as they can. They never worry about how much range is needed to carry these herds or where range they are carried on. A large share of these animals graze on land owned by private land owners, taking feed from private land owners that should be for their livestock. We feel, if you want to do a good job of trying to maintain what number the BLM should carry, go back for at least twenty (20) years and make the BLM prove they have the summer range as well as the winter range to carry the number of animals they would like to carry. Although the number of animals that died in the severe winter was very high, we feel if the Fish and Game Department would have been more lenient with their herding, this catastrophe would never have happened.

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We also feel since the livestock people pay to use the land they are on, they should be given some preference rather than people who use the land free. During your data gathering phase, the state of preparers for the BNP consisted of BLM officials and their experts. No local livestock experts were used, thereby presenting a one sided point of view. The Department of Wildlife provided all of the information for the wildlife numbers presented in the RMP. No request was made by the BLM to the permittees for historic wildlife numbers, which should have been provided. After all, most of the permittees have been on the range land for most of thirty years and would have an accurate idea of historic wildlife numbers. They would have been glad to furnish these numbers for the wildlife study. The permittees are watched the whole time they have their livestock on the BLM ground. If it becomes over grazed their numbers are either cut or they are asked to move off of BLM ground. This does not happen with the DCR. If they try to carry too much wildlife, they over graze or die, no one controls these numbers on BLM land only the Department of Wildlife controls.

141-8

Historically, most elk herds are found in the high country. In the winter time they would move to the lower brush lands. Because of the large numbers of elk the BLM carries, they have spread basically over Moffat County. This has caused problems for ranchers and farmers, not only from crop damage, but from grazing their private land, that historically their cattle and sheep could graze.

Now we would like to address the minerals. One of our major concerns to the document has a definite negative approach and outlook towards those who derive their livelihood from public lands. The coal industry particularly, which provides thousands of jobs in Northwestern Colorado, and generates millions of dollars in royalties to the federal government. One half of this money is returned to Colorado and another portion is returned to the local county.

141-9

The Moffat County Commissioners would take any steps necessary to avoid any negative impacts from your plan on coal development. It seems in your plan, any negative impacts from coal development are magnified almost out of proportion while beneficial impacts are essentially ignored.

Contrary to most of the comments in your plan, it hinders more than helps development in Northwest Colorado. You leave over 600,000 acres of land identified as acceptable for further consideration for coal leasing. The management of adjacent areas is designated for such things as wildlife habitat, soil, water and recreation which may preclude development.

141-10

The BNP should address the necessity to allow transportation of coal to markets be done as reasonably as possible. Also, corridors for transmission lines, water supplies and access for both employees and other supplies. We also object to the use of visual resource management classifications that assume that any activity by man will produce a negative visual impact regardless of its location. While this may represent a purist attitude, we believe it does not

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141-1

reflect the attitudes of the general public, particularly the residents of Northwest Colorado. We feel we have proof that the mines operating in our area today, the hole is covered as soon as the coal is stripped. The top soil is replaced and returned to vegetation. The land south of Craig is probably better than it was before the land was stripped. We believe before the plan is approved, the BLM should make an effort to further clarify those areas which actually contain surface or underground recoverable coal reserves and be plotted on a map.

In a couple of areas where BLM has designated coal tracts, these tracts are designated not to enter a recreation management area or wildlife management area. We feel once this plan was put in place, anybody who would try to develop a mine in an area that sounds either a recreation area or a wildlife area would have considerable problems in getting the necessary permits. It would preclude numerous future and existing conflicts.

The Moffat County Commissioners recommend the BLM specify the boundary lines on the map be used as a general guide to management and not as lines defining the exact resource boundaries. Around mining units, we would particularly ask, if possible, the designation remain as it is today as a multiple use area to save any further problems from people who would not want a coal mine next to a recreation area.

In closing, we would like to reiterate the Moffat County Commissioners feel very strongly this plan should not interfere in the operation of coal mines, now or coal mines that may develop in the future. It should also not interfere with ranching operations that have gone on historically in Moffat County for years. Between energy and agriculture, it has been the economic base of Moffat County over the past several decades. We do not feel the BLM should interfere in any way that would be a detriment to these industries. We would request that if it is at all possible, the BLM leave the land they administer in our county under a multiple use situation. This has been this way for several years and we feel the BLM does a good job of administering the land under a multiple use plan.

141-12

The Moffat County Commissioners feel this document is tantamount to land classification or zoning. By Colorado law, zoning the responsibility of County government. We recommend this document be set aside until the Director of BLM has had an opportunity to assess its use. There appears to have been a large number of personnel changes during the preparation of these documents which could affect the use and continuity of data, and in some instances resulted in the lack of objective analysis due to unfamiliarity to the

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Resource Study Area. Based on the foregoing finding, we feel the statement should be rewritten as a draft document and submitted again to the public for review and comment.

Sincerely,

*Thomas E. Lefevre*  
Thomas E. Lefevre  
Chairman

njt

Encl

May 4, 1986

Gary Vicintainer  
Vicintainer Sheep Co.  
P O Box 395  
Craig, Co. 81626

Little Snake Resource Plan  
Bureau of Land Management  
Craig District Office  
455 Emerson Street  
Craig, Co. 81625

Sentlemen:

I would like to address three areas of concern to me. First is the area in which BLM owns no surface estate, instead only owns subsurface estate. It is my impression from the draft statement that the BLM is trying to dictate surface estate through via subsurface management plans. I believe no reference should be made as to how subsurface will be managed in regard to surface estate, unless the BLM owns the surface or there is a written agreement with the estate owner. That in to say there should be no FCA areas. These areas should be designated as mineral areas, either available for lease or nonavailable for lease.

142-1

The second area of concern deals with the drawing of finite lines as to designate different areas of management. These finite lines indicate to me that an infinite amount of data has been collected over an extensive time span. This is to say that the boundaries were arrived at by data analysis, and not by man. From the draft statement itself, it is obvious that a very finite amount of data instead of an infinite amount of data was used. It is my concern that to alter management in the future may be difficult, even though erroneous data was used to define these areas.

The third area of concern deals with the lack of adequate data collection prior to area designation. I feel that to alter future management practices in areas may be extremely difficult, even though adequate data was not collected prior to designation.

Respectfully Submitted

*Gary Vicintainer*  
G. Gary Vicintainer SWM

P.O. Box 604  
Glenwood Springs, CO 81602  
May 8, 1986

William J. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, CO 81625

Dear Mr. Pulford,

I understand that the B.L.M. has recommended against wilderness designation of Cross Mountain Wilderness Study Area, and I urge you to reconsider that decision. Unquestionably, Cross Mountain is of wilderness quality. The abundance and diversity of its wildlife perhaps make it a unique area in the state.

143-1

The oil and gas potential of this area is miniscule in comparison to its wilderness values. There are tremendous reserves of oil and gas elsewhere in Colorado and in the West, but a wilderness such as Cross Mountain is irreplaceable. I hope you will act to protect this place for those of us who live here now and for future generations.

Thank you very much.

Sincerely,

*Judy H. Hatt*  
Judy Hatt

May 7, 1986

Bureau of Land Management  
Craig District Office  
455 Emerson St.  
Craig, CO. 81625

To whom it may concern;

Thank you for this opportunity to review and comment on the Little Snake Resource Management Plan and Environmental Impact Statement.

Certain areas within the Little Snake Resource Area are of particular interest to me as recreational retreats. Over the past few years I have made several backpacking trips into Dinosaur National Monument. I feel that the Ant Hills, Chew Winter Camp, Peterson Draw, Teepee Draw, and Vale of Tears Study Area should be incorporated in our wilderness preservation system. These areas act as a scenic corridor and an important buffer-zone between increasing human activities and the fragile Dinosaur ecosystem.

It is not difficult for me to realize that these study areas possess those wilderness qualities and characteristics established by Congress. It is time that our public land managers and administrators act responsibly and carry out the intent and letter of the law.

Sincerely Yours;

John E. Packer  
John E. Packer

William Pulford, Craig District Manager  
Bureau of Land Management  
455 Emerson St., Craig, CO 81625

May 4, 1986

Dear Sir:

I would like to submit a few comments concerning the Wilderness Study Area recommendations as contained in the Little Snake Resource Management Plan.

Discrimination against wilderness is the obvious conclusion I have reached upon reviewing the comments on the WSA's. Granted you did recommend Diamond Buckles, but considering the amount of BLM land in the Little Snake RA, this is paltry. As for Cross Mountain and West Cold Spring, you should be thinking of innovative ways to protect the natural, wild, & even rare animals present in these areas (including wilderness status), rather than scheming to introduce oil and gas development. The WSA's adjacent to Dinosaur N.M. should be protected via Wilderness designation - they are naturally a part of the Dinosaur N.M. anyway.

Finally, I would like to see the BLM start to seriously consider the value of Wilderness, not just consider it as an afterthought once all other resource possibilities are exhausted. Wild lands and wild animals become scarce by the day, and they must be placed high on everyone's list, or the American heritage will disappear.

Sincerely, Kathy Hanks

Dear Sir,  
In regards to the Draft Resource Plan - Little Snake Area. I appreciate the inclusion of the four SMA's, i.e. Cross Mountain Canyon, Lincoln Canyon, Lookout Mt. and Limestone Ridge into the "Preferred Alternative."

I also support SMA designation for the four proposed areas of Oak Spring, Lo-Gap, Horse Draw and Hells Canyon.

In addition, I would encourage wilderness designation for as much of the undisturbed land of the area as possible, specifically of the Cross Mt. area north of the river.

Sincerely,  
Edward L. Horn  
Craig, Co.



FRIENDS OF THE EARTH

P.O. Box 728  
Palisade, CO 81526  
(303) 464-5329

May 8, 1986

Mr. Bill Pulford, District Manager  
Bureau of Land Management, Craig District  
455 Emerson Street  
Craig, CO 81625

Dear Mr. Pulford:

The following comments are on behalf of Friends of the Earth; these comments expand on the oral testimony which I presented at the March 10, 1986 public hearing on the Little Snake Resource Management Plan/Draft Environmental Impact Statement. Additionally, I have reviewed comments by the Sierra Club-Rocky Mountain Chapter, and the Colorado Native Plant Society. I wish to support and incorporate by reference all of their comments, especially on wilderness and special management areas, and see no reason to repeat them here.

Generally, I found the Little Snake REIS to be very deficient in a number of resource issues. In fact, it is one of the worst ones I have ever reviewed in terms of its lack of balance in treatment and recommendations on various resources. Renewable resources for the most part are given short shift and the grazing and oil and gas resources are given extremely favorable treatment in terms of number of acres allocated and lack of restrictions. This favoritism towards certain resources runs throughout the REIS and is so severe that the structure of the REIS does not meet NEPA and CDA regulations. I will cite a few examples of this problem and make some recommendations on how to revise this REIS.

Upon reviewing the Planning Issues and Criteria on pp. 1-5 to 1-10 and comparing these issues to the actual analysis and recommendations of the alternatives, it is evident that the preferred alternative falls far short of stated actions in the issues section. For instance, the recommendations under Issue 2 cite plans and actions needed on grazing. However, the body of the REIS does not include maps of the allotments, making any analysis by the public impossible. It does have information on the range conditions of allotments, citing that 77% of the allotment acreage in the District is in poor condition with another 23% in unknown condition. It is clear both from the issues and criteria as well as the other sections in the REIS that various management studies and actions need to occur PRIOR to the implementation of changes in grazing allotments. Yet the preferred alternative appears to have no relationship or basis in fact to stated criteria—it simply presents a typical grazing program which has no connection to the NEPA process supposedly being adhered to. It recommends an extensive portion of the Resource Area to remain open to unregulated grazing, and to top matters off it proposes extensive range improvements which have no relationship to the earlier stated lack of data on range condition. I can draw no other conclusion than that the range improvements are simply a wish list of the local ranchers and the BLM is blatantly responding to one special interest group.

RECOMMENDATION: Review the REIS alternatives, and make appropriate changes to make them consistent with the stated issues and criteria. Make the entire analysis of grazing in the REIS. Do not recommend any range improvements in the REIS. Include an analysis of the Holistic Resource Management (Savory) method as a

147-3] alternate method of range management.

The alternatives do not provide a clear distinction and different levels of use for an number of resources. Again it falls short of NEPA standards. The bias of the alternatives is clearly towards maximization of grazing and energy and mineral resources. Protecting wilderness and special management areas, the renewable resources and natural environment alternatives are simply not significantly different enough from the current management and preferred alternatives to offer a meaningful choice. The preferred alternative does not differ substantially in the levels of production from the current management, nor does it offer a balanced approach in terms of the amount of acreage and type of restrictions granted all of the resources. Most apparent is the lack of wilderness and special management area recommendations. As pointed out in the Sierra Club and CNS comments the acreages for these resources are minuscule compared to that allocated for grazing and oil and gas production throughout the area. The preferred alternative is a thin disguise for continuing the irregularities and deficiencies in the current management favoring certain industries.

**RECOMMENDATION:** Revise the preferred alternative to offer more protection and more balanced acreages for resources other than grazing and oil and gas production. In lieu of revising the preferred alternative make the natural environment alternative the preferred one. Institute real protections in the preferred alternative—i.e. restrictions in terms of acreages and legal, enforceable, permanent protections like wilderness area, special management areas, and wild and scenic river eligibility. Using no-surface occupancy stipulations and special recreation management designations are ridiculous—these are not valid responses to the conservationist's concerns about protections. After all, how would BLM enforce them?

In sum, the entire Draft RMO/EIS analysis and alternatives need to be redone to the extent that another Draft EIS should be compiled and released for public comment. Giving a few bones to the environmentalists, e.g. a few more acres of wilderness recommended for the Final EIS will not solve the NEPA deficiencies in this document nor offer a balanced use of resources. I urge at the minimum the Sierra Club recommendations to be included as final recommendations, but more specifically urge a total revision of the Draft EIS to incorporate a balanced approach to all resources.

Sincerely,

*Connie Albrecht*  
Connie Albrecht  
Colorado Representative

May 7, 1986

William Purifera  
Bureau of Land Management  
455 Emerson Street  
Craig, Colorado 81625

Dear Mr. Purifera,

I am writing this letter in response to the BLM's recommendation that Cross Mountain not be designated as a wilderness area. As a Colorado resident who has seen the history of less stringent land management practices, I urge you to reconsider your decision.

The Cross Mountain area provides unmatched wilderness for rangers (even as myself) and gorgeous scenery for backpackers & hikers. I am sure that you are aware that bighorn sheep, antelope and elk still make their home in the Cross Mountain area, and that some endangered fish species can still be found in the spring waters.

What I fail to understand is why you are willing to forever give this up in order to achieve

oil and gas, which to be drilled in this area when there is already a well there. Additionally, Cross Mountain is in the vicinity of 1875 and 1876. If land which is open to drilling, why must you destroy this 17% of the land, which if left alone is priceless for our use and generations to come.

Sometimes it seems like the oil and gas interests control the BLM. How can you justify your purpose?

Please, on behalf of all the citizens in our world, don't destroy another treasure, and have lost too many already.

Sincerely,

Emily A. Beckhaus

MRS. HERMANA G. KILGORE  
1424 Acacia Drive  
Colorado Springs, CO 80907

May 8, 1986

JL 2 201:

We are very much opposed to anti-wilderness recommendation for Cross Mountain.

149-1] We are in favor of wilderness designation and environmental protection.

Sincerely,  
Hermana G. Kilgore  
(Mrs. R.O.)



May 8, 1986

Mr. William J. Dufford  
 Craig District Manager, BLM  
 455 Emerson St.  
 Craig, CO 81625

Dear Sir:

I thank it is an extraordinary proposal that the  
 Cross Mountain District not be considered in the  
 entirety for wilderness designation.

The area is fantastic, ecologically diverse, and  
 crucial habitat for many threatened and endangered  
 species.

150-1

The opportunity to designate wilderness is itself  
 quickly becoming endangered, and with the idea  
 that oil and gas takes precedence over our  
 invaluable living natural resources, we are  
 ruining irreplaceable assets.

Please reconsider and designate Cross Mountain  
 area the appropriate wilderness protection it deserves.

Sincerely,

Barbara W. Brown  
 Great Sand Dunes National Monument  
 Mosca, CO 81146

I protest the plan to restrict the use of motorcycles and all terrain  
 vehicles in the Sand Wash Basin area west of Haystack, Colorado.

Bo Stanbaugh	John Whitt	David Dworakowski
Merle W. Nash	Rick Barber	Bob Van Dover
Nick Sharp	Robert A. Bryant	Doug Baker
Dennis Russell	Sibyl Carle	Ken Heaberlin
Jennifer Bowers	Sue Stanbaugh	Ken Simpson
John Berger	Don W. Markley	Dan Allen
Tim Pingleton	Greg Samuelson	Al Bender
Alan A. Luksf	Larry Bereyrak	Dan Koler
Glen Bronnenberg	Patrick D. Guersin	Jie Vall
R.G. Rapp	Chris Kille	Joe Zuntga
Richard Lamy	Myron Riewe	Cenny Burton
Kamf Ross	Kathl Ross	Nick Ross
Ed Burton	Wayne A. Melon	Carol L. Nelson
David A. Gibeau	Barbara Gibeau	Thomas R. Armstrong
Paul W. Smith	Stephen A. Riley	Bud Baker
Dennis Wahl	Chuck Baker	Joseph M. Sack
Michael R. McIntosh	Craig Meade	David M. Hernandez
Vicki L. Bowers	Keith/Kelli Skoll	Jim Townsend
Thomas E. Whiddon	Jeff Roman	Kate Townsend
Stan Stafford	Dennis A. Johnson	Bill Fletcher
Rick Fisher	Scott A. Helms	Bob/Kay Helms
Cliff Campbell	Dottie Adams	Michael G. Wheeler
Mack Spittellie	Robin Babin	Sharon Graham
Jin Cox	Bob Davis	Randy Purcell
Salvator Riele	R.J. Seib, Jr.	Charles F. Chert
Glen W. Clark	Pete Mathers	Alan C. Selch
Allen/Linda Murcek		

8731 State Highway 13  
 Mosca, Colorado 81141  
 (303) 821-4431



HAND DELIVERED

May 9, 1986

Mr. Duane Johnson  
 Team Leader Little Snake Draft RMP/EIS  
 Bureau of Land Management  
 455 Emerson Street  
 Craig, CO 81625

Dear Mr. Johnson:

Colowyo Coal Company would like to thank you for the opportunity to provide the attached comments in regards to the Little Snake Draft RMP/EIS. These comments will serve to reiterate and expand upon our written comments of May 3, 1985 and oral testimony on March 12, 1986.

We realize that to develop a comprehensive management plan which incorporates as large an area as the Little Snake Resource Area with all the complex multiple resources was an immense task and the BLM should be commended for its efforts.

We did, however, find the Draft EIS to be a very confusing document to follow. The format was particularly difficult to follow especially with the many proposed management actions and related issues.

We hope that the BLM will consider our comments and will develop a useful, more realistic management plan in the Final RMP/EIS.

Sincerely,

COLOWYO COAL COMPANY

R.G. Atkinson

Chief Reclamation Engineer

RGA/ym

cc: Central Files

COMMENTS TO THE DRAFT  
 LITTLE SNAKE  
 RESOURCE MANAGEMENT PLAN AND  
 ENVIRONMENTAL IMPACT STATEMENT AND  
 WILDERNESS TECHNICAL REPORT

By

COLOWYO COAL COMPANY

GENERAL STATEMENTS:

One of our major concerns is that the document has a definite negative approach and outlook towards the paying users of the public lands, such as ranching, agriculture and the energy industries, while the non-paying users are looked upon more favorably. The BLM should make more of an effort to maintain the industries that provide for thousands of jobs in Northwestern Colorado which generate millions of dollars of rentals and royalties back to the public. One-half of these monies are returned to Colorado and to the local counties. Provisions for the non-paying users of public lands should be insured, but certainly not to the detriment of those that derive their livelihood from these lands.

The concept of Management Priority Areas appears to have some merit for the management of special resource values, but the concept has many weaknesses.

152-1 The concept seems to have done away with the "Multiple Use" concept the BLM has traditionally used for resource management and has replaced it with a single use concept.

Many of the areas are designated for a single use such as wildlife, soil and water constraint areas, and recreation areas, and will be managed at the expense of the remaining multiple land uses for the life of this document, perhaps 20 years.

152-2 Many of the Management Priority areas, such as the FMCA areas, are imposed on areas of private or state owned lands. The BLM has imposed management constraints on the private and state surface based on its ownership of the mineral resources of these lands. These constraints should be restricted to surface lands administered by the BLM.

We recommend that the BLM reevaluate the Management Priority Area concept to ensure that it is not used arbitrarily and in such a manner that would preclude private property rights of lands not managed by the BLM.

COAL:

152-3 Although the Draft RMP states that 638,000 acres of land would be identified as acceptable for further consideration for federal coal leasing, the management of adjacent areas designated for wildlife habitat, soils/water, or recreation may preclude development. The RMP should address the necessity to allow for transportation corridors from coal areas through other RMP alternative management areas in order to transport coal to a market, provide transmission line and water supply access, and access for employees, supplies and services.

152-4 Some of the areas that have been delineated under the Preferred Alternative may be acceptable for further consideration for coal leasing, but in fact do not contain surface or underground mineable reserves. We believe the 638,000 acre figure overstates the realistic acreage of lands that contain mineable coal reserves.

152-5 An example would be parts of the Great Divide area. We believe the BLM should have sufficient information from USGS to accurately delineate areas containing surface or underground coal reserves that could be mined in the Great Divide area in the foreseeable future. The BLM has inappropriately applied unsuitability criteria in areas that will not be mined in the foreseeable future. The BLM should remove unsuitability designations from areas that do not have mineable coal, particularly the two Township PMCA 1 area north of Craig.

#### RECREATION:

We have reviewed the "Nationwide Rivers Inventory" which discusses the purpose and methodologies used by the National Park Service during the first nationwide inventory of significant free flowing rivers.

In the "Methodology" section (page 3, part 3 - Cultural Development), the document states that "River segments having a cumulative point-per-mile total of 100 or more were disqualified. Remaining segments were retained for further evaluation."

When reviewing the "Cultural Development Scoring Sheet" for the Yampa River, the river was considered as one segment from the Little Snake River confluence to the river's source (confluence of Wheeler Creek and Bear River). Evaluating the Yampa River in this manner has given the false impression that the river "qualifies" because of low total points per mile of 36. In fact, the river has distinct sections where the points per mile would far exceed the 100 points per mile limiting criteria. These segments of the river would be "disqualified" by the Inventory Rating Criteria, but fall short when weighed against the long stretches of the river that are undeveloped and are rated "qualified" by the rating criteria.

In a USDI/BLM letter dated September 19, 1980 from Charles W. Luscher, Acting State Director to Barry A. Tollerfon, Project Leader, Nationwide Rivers Inventory, Heritage Conservation and Recreation Service, the BLM recommended that the section of river from Milk Creek to the Duffy Tunnel be considered for inclusion due to the presence of outstanding values.

152-6 Since the BLM has in the past looked at distinct sections of the river to determine their eligibility, we recommend that the BLM reevaluate the Yampa River again in order to determine those sections of the river which meet the eligibility requirement and those distinct sections of the river that do not meet the eligibility requirements of either a wild, scenic or recreational river.

Until the Yampa River is reevaluated, we assume that the BLM will manage the river according to the Federal procedures to avoid or mitigate adverse effects on NRI streams. The BLM will then, in effect, be able to manage the entire Yampa River as an NRI river although there are sections of the river that do not fit the rating criteria. We urge the BLM to reevaluate the Yampa River as soon as practicable.

resource development and public land use other than primitive or semi-primitive settings and opportunities. For example, all of the discussions in the use of Visual Resource Management classifications assume that any activity by man will produce a negative visual impact regardless of its location. While this may represent a purist attitude, we believe that it does not reflect the views of the general public and particularly the residents of Northwest Colorado. Colowyo recommends that the BLM revise its classification system to provide a more realistic and practical viewpoint.

152-9 The BLM should also be aware that designation of special recreation areas and special management areas may, in light of the proposed new EPA regulations to control fugitive dust, effectively force closure of all surface mines in Northwest Colorado. We recommend that the BLM reevaluate these special management areas in order to determine the possible effects any new EPA/PSD regulations would have on local industries.

#### WILDLIFE HABITAT:

In general, many of the sections dealing with wildlife are lacking an adequate information data base. Many questionable conclusions have been drawn based on subjective judgments rather than field information, leaving the reader with questionable proposed actions and conclusions. We believe that many of the management decisions are based on limited or no information and could be flawed. We recommend that the BLM reevaluate the wildlife sections of the document in order to ensure the management decisions are objective rather than subjective.

152-10 The Draft RMP makes a statement on page 4-77 that surface mining activities and oil and gas development in Axial Basin would cause a loss of Mule Deer critical winter range. To our knowledge, coal, oil and gas reserves are not within the areas of Axial Basin that are considered critical winter range. These reserves are located in areas at a higher elevation than the critical winter range in the Axial Basin region.

Further, the Draft RMP makes additional comments in regards to winter range in Axial Basin. For example, on page 4-24, the Draft RMP states:

"Under the Current Management and Energy and Minerals alternatives, critical winter range in Axial Basin southwest of Craig would have the potential of being developed. This area represents 13 percent of the total mule deer and 53 percent of the total elk critical winter range on BLM land in the resource area. It supports a winter density of 50 to 100 mule deer per square mile. Because critical winter ranges are near or at carrying capacity, a high percentage of displaced animals would be lost. Therefore, every square mile of habitat loss would translate into a loss of 50 to 100 mule deer, a significant decrease in the total population."

152-11 We disagree with the statement that the Axial Basin critical range is at or near carrying capacity. We believe that during most years, the deer population utilizing the deer critical winter range in Axial Basin is well above the carrying capacity of the critical winter range during a critical winter.

152-8 able in order to avoid unnecessary and unwarranted regulation of the paying users of adjacent public lands.

152-7 We do not believe that the section of the river from the confluence of the Williams Fork River to the confluence of Milk Creek would qualify as eligible for protection management as a special recreation area since the BLM only controls a relatively narrow strip of land and the area already has powerlines, a railroad spur, numerous roads, and numerous agricultural improvements, resulting in a landscape far from the semiprivate designation in the document.

The Draft RMP states on page 2-69, concerning the Little Yampa/Juniper Canyon Special Recreation Management area that "Protective management is needed to maintain desired semiprimitive settings and opportunities that would be lost through other noncompatible uses such as mining".

We believe that the upper Little Yampa Canyon unit does not contain a semiprimitive setting due to the numerous improvements in the area, and further protection to maintain a nonexistent semiprimitive setting is certainly not necessary.

The Draft RMP also states on page 2-69 "Management of the upper Little Yampa Canyon unit would be the same as described above, except that necessary activity associated with development of the proposed Iles Mountain coal tract (if leased) would be considered and evaluated on a case-by-case basis".

We suggest that to be consistent with the apparent definition of a "Special Recreation Management area" the so designated management area located along the Yampa River should begin at the confluence of Milk Creek, rather than the Williams Fork River. Present use of the upper Little Yampa Canyon by float-boaters certainly should be maintained, but not to the detriment of the present or future paying users of the public lands.

The Draft RMP should also recognize that further development of coal resources in the Danforth Hills as well as the Iles Mountain coal tract may also have to be evaluated in terms of further access needed along the Yampa River for transportation of coal to a market, powerline and water supply access and possible access for employees, supplies and services.

152-0 Colowyo currently utilizes the railspur, part of which includes a railroad right-of-way grant from the BLM, along the upper Yampa Canyon stretch of the Colowyo Mine in the Danforth Hills, and we may require further access to the Yampa could inhibit necessary maintenance on the ability to produce coal, which would reduce id specifically recognize that maintenance of the Colowyo railspur will be ongoing in this area.

Colowyo has a conditional water right on the Yampa River to pump water from the river to a proposed reservoir on Milk Creek. Establishment of a Special Recreation Use Area would inhibit Colowyo's ability to develop the water right.

Throughout the document, and in particular the sections dealing with recreation, the overriding emphasis appears to reflect a negative attitude towards

Normal winter weather in the region allows the deer population to increase far above the numbers that can be supported during a critically severe winter. In fact, the DOW target deer population for the affected Game Management Units is probably far in excess of the numbers that can be supported on the critical winter range during a critical winter.

A perfect example is the severe winter of 1983-84 when deep, crusted snows and below 0°F temperatures caused a near 100 percent mortality in the fawn crop and perhaps 50 percent mortality on the remaining deer population on the winter range. These losses occurred not because of development in the area, rather the losses occurred because the DOW allows the deer population to build up above the carrying capacity of the critical winter range.

152-11 The draft EIS should recognize that severe losses will occur on the critical winter range in Axial Basin during a critical winter regardless of whether there is additional development in the region or not. These losses would further increase if the DOW goals of an increased deer population in the region are achieved.

We certainly agree that surface development in the Axial Basin region would affect the wintering populations of deer and elk. We do believe that there is enough data concerning this region and knowledge is available concerning the wildlife that the BLM can do better than offer an outdated, oversimplified statement that equates acres of habitat lost to a corresponding number of deer lost.

On page 4-22, the Draft RMP addressed the possible impact of coal mining activities to sage grouse strutting areas and breeding grounds.

The BLM should be aware that most of the sage grouse breeding grounds are located in the lower elevations of the Danforth Hills towards Axial Basin and are outside of possible mining areas.

152-12 Although most of the sage grouse breeding grounds are located in the lower elevation of Axial Basin, much of the broad rearing habitat is located in the middle to higher elevations of the Danforth Hills associated with the long term water sources and associated wet meadow type vegetation. In many cases these broad rearing habitats are much further than two miles from the breeding grounds.

The Draft RMP narrative attempts to leave the reader with an unrealistic scenario as to the possible impact that coal development would have on the sage grouse population in the region. The BLM should reevaluate the analysis of the potential effects of coal mining on sage grouse populations to more accurately reflect the biological habits of the sage grouse populations versus the potential locations of mining disturbances.

#### Page 4-63, Issue 3-1, Coal

The draft EIS makes the following statements regarding coal development and its effect on hunting:

152-13 "Development of coal reserves would most seriously affect hunters and those individuals desiring semiprimitive settings and opportunities. Less area would be available for hunting; therefore, hunters would be forced onto other public land

areas, thus diminishing user expectations. . . Continued leasing of coal resources under all alternatives would close some areas to public use."

We do not believe that these two statements are entirely true.

The reader is left with the impression that all prospective coal development areas are comprised entirely of public lands that are fully open to public hunting and other recreational uses.

152-13 In the majority of instances, the opposite is in fact true. In most instances, the areas of prospective coal development is of mixed public/private surface ownership or entirely private ownership. In many cases the private lands currently surround public lands. As a result, public hunting has historically not been available on any of the lands, whether private or public surface.

Coal leasing or coal development of these areas would not change the availability of the lands for public hunting. If public hunting has historically been unavailable on these lands prior to the involvement of the coal developers, there is certainly no reason to believe public hunting would be available in the future.

The Draft RMP should also recognize that although many coal development areas remain closed to public hunting, many coal company employees are given the opportunity to hunt on these lands. In effect, the introduction of coal development to some lands will actually result in increased hunting and other recreational uses many times greater than the historical uses.

#### WATER RESOURCES:

Page 4-38

152-14 The first paragraph cites three streams, Trout Creek, Milk Creek and Foidel Creek, as having elevated levels of total dissolved solids and sulfate concentrations due to coal mining activities. We believe that the narrative may have inadvertently substituted Milk Creek for Middle Creek.

152-15 In the third paragraph, the Draft RMP states that "erosion of road surfaces and un reclaimed mine spoils during storm events would increase the sediment reaching stream channels". This is in fact not true. Assuming that "stream channels" refers to perennial streams, federal and state laws require that all surface drainage from a coal mine must pass through a sediment control structure and cannot be discharged until meeting certain effluent standards. Therefore, any additional sediment entering a stream channel would not originate from a mining disturbance. In fact, due to the stringent effluent standards regulating the discharge from these ponds, the discharge is often times much higher in quality than the receiving stream.

152-16 Nowhere in the Draft EIS is there any reference to the proposed construction of the Juniper/Cross Mountain Dam projects. We suggest that this document is not complete unless the BLM analyzes the economic impact the RMP policies would have on these two projects. We believe the BLM should also recognize the overwhelming support given to these projects by the residents of Northwest Colorado.



**NATIONAL WILDLIFE FEDERATION**  
1412 Sixteenth Street, N.W., Washington, D.C. 20036-2266 (202) 797-6800

May 8, 1986

Mr. Duane Johnson  
Program Manager  
BLM Craig District Office  
455 Emerson  
Craig, Colorado 81625

Dear Mr. Johnson:

As was agreed upon in your conversation of May 7, 1986, with Kathleen Patnode, the National Wildlife Federation is submitting its comments on the Little Snake Resource Area Plan/EIS on May 12, 1986. The National Wildlife Federation is the nation's largest conservation/education organization, with 4.5 million members and supporters in 51 states and territories, including the State of Colorado.

We appreciate the opportunity to participate in the development of a management plan for the Little Snake Resource Area which balances the Bureau's multiple-use objectives.

Sincerely,

*David Alberswerth*  
David Alberswerth  
Acting Director  
Public Lands & Energy Division

Enclosure



**NATIONAL WILDLIFE FEDERATION**  
1412 Sixteenth Street, N.W., Washington, D.C. 20036-2266 (202) 797-6800

#### COMMENTS OF THE NATIONAL WILDLIFE FEDERATION ON THE DRAFT LITTLE SNAKE RESOURCE MANAGEMENT PLAN/EIS

Submitted by

David Alberswerth, Acting Director  
Karl Gavell, Legislative Representative  
Kathleen Zimmerman, Counselor  
Kathleen Patnode, Conservation Intern  
Public Lands and Energy Division  
Resources Conservation Department

May 8, 1986

#### INTRODUCTION:

The primary interests of the National Wildlife Federation in the proposed Little Snake Resource Management Plan relate to the impacts on wildlife of the following six basic issue areas: withdrawal review, oil and gas leasing and development, coal management, livestock grazing, terrestrial habitat management, and riparian area management. We will examine each of these issue areas in turn.

#### WITHDRAWAL REVIEW:

153-1

According to the draft RMP, "the Bureau would actively pursue the revocation of all withdrawals in the resource area, except for public water reserves, and those withdrawals related to U.S. Fish and Wildlife Service, the National Park Service, and U.S. Forest Service." (p.2-18) Under Section 202 of the Federal Land Policy and Management Act, 43 U.S.C. §1712(1982), all decisions concerning prior withdrawals must be reviewed in the course of developing resource management plans, and can be revoked or modified only if they are consistent with land use planning authorized under the Act. However, no specific information is provided in this RMP as to the location of the lands in question, their current usage, the intent of the withdrawal, or most importantly, the environmental impacts of the proposed revocations.

1/11 is unclear from the discussion presented in the RMP whether or not the review of existing withdrawals will include consideration of classifications. However, our comments here apply to both withdrawals and the subcategory of withdrawals known as classifications.

153-1

Given these facts, we recommend that the Bureau provide the public with the detailed information on each withdrawal being considered for revocation and the opportunity to comment on the proposed action within the context of the Little Snake RMP as mandated by Section 109 of the Federal Land Policy and Management Act, 43 U.S.C. §1739(1982).

In addition, the Bureau must comply with the Order entered by the Federal District Court of the District of Columbia on February 10, 1986 in CA No.85-2238 as follows: the Bureau may not revoke, terminate, or otherwise modify withdrawals; nor may it take any action inconsistent with the specific restrictions of a withdrawal or classification in effect on January 1, 1981, including but not limited to the issuance of leases, the sale, exchange, or disposal of land or interests in land, the granting of rights of-way, or the approval of any plan of operations.

#### Oil and Gas Leasing and Development:

With respect to the Draft Plan's treatment of oil and gas leasing and development within the Resource Area we have the following comments:

153-2

1) The emphasis on encouraging development throughout the entire resource area, as indicated by the plan's assertion that "as a general rule, public land would be available for oil and gas leasing," (p.2-13) biases the results of the proposed management plan and conflicts with the Federal Land Policy and Management Act's mandate that:

The public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological,

153-4

4) By the RMP's admission, the effects on wildlife "for a single project might be minimal, but the cumulative impacts from several projects in an area might be substantial." (p.4-25) Furthermore, the RMP indicates that "5-year development" plans are requested of oil and gas lease holders indicating that the Bureau considers such plans essential to its ability to manage the resource in this area. (p.3-26) Therefore, these 5-year development plans should be adopted as a requirement for all new leases and the agency should require such plans of all existing leases.

153-5

5) The Draft Plan fails to adequately examine and analyze the cumulative adverse impacts from oil and gas development. This is particularly important for oil and gas leasing because: 1) there is no subsequent opportunity to examine cumulative impacts, and 2) the RMP agrees that the adverse cumulative impacts of oil and gas development upon wildlife may be substantial. The BLM, therefore, is obligated under the National Environmental Policy Act to prepare an Environmental Impact Statement on this issue. The analysis of the Draft Plan clearly fails to meet these obligations, and the BLM should refrain from issuing and new oil and gas leases, or approving any new applications for permits to drill, until such an EIS is completed and approved.

153-6

6) The document mis-uses "no surface occupancy stipulations" (NSO's.) "Several large areas are proposed for leasing with NSO's" (Table 2-29). These areas are too large to accommodate directional drilling, and leases should not be issued in such circumstances. The Little Snake Resource Area BLM staff should note the conclusions of the BLM in the Headwaters Resource Management Plan:

A rule of thumb is that oil and gas resources over one-half mile from a drill site probably cannot be

environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use... (43 U.S.C. §1701 (a)(8))

153-3

2) Although defined as a balance of multiple-use objectives, the preferred alternative calls for far less compromise in oil and gas development than it does for renewable resources protection. For those resources, the preferred alternative mandates only a 2.4% increase in "no new leasing" acreage and a 6.6% increase in acreage under stipulations from the energy and minerals alternative. On the other hand, the transition from the renewable resources alternative to the preferred alternative calls for a 36% decrease in "no new leasing" acreage and an 8.4% decrease in land covered by stipulations. (p.2-75) In light of the fact that over 95% of the resource area is presently under lease for oil and gas (p.4-25), we propose a re-evaluation of the balance between oil and gas development and non-commodity management.

3) Our concern for habitat disturbance from oil and gas development is heightened in several specific areas including winter range and concentration areas in Irish Canyon and Limestone Ridge; critical winter range in Cross Mountain; and critical winter range and extensive raptor nesting sites in Little Yampa Canyon-Juniper Mountain. (p.4-25) With populations in these environments at or near carrying capacity, "physical destruction of wildlife habitat and loss of habitat for the life of an oil and gas field could be one of the more significant impacts." (p.4-24) Therefore, we recommend that protection of the latter three areas be intensified through ACEC designation as is proposed for Irish Canyon.

153-7

drained without directional drilling. Directional drilling in structurally complex areas is unproven and we have assumed it is not feasible in our assessment of environmental impacts. Therefore, if no surface occupancy areas are over one-half mile wide, the area more than one-half mile from an occupancy site is not leased, since the feasibility of developing oil and gas from beneath it is poor. In some cases of extreme topography, this distance is reduced to one-quarter mile. (pg. 55, Final Headwaters Resource Area RMP/EIS, November 1983, BLM.)

7) The document mis-applies seasonal restrictions. Seasonal restrictions may be appropriate for mitigating impacts from exploration and limited development activities. However, seasonal restrictions may not be applicable to an operating field which requires continual maintenance. In such cases, such seasonal restrictions may create serious safety hazards. Therefore, seasonal restrictions are of questionable use in mitigating the potential impacts of oil and gas operations. The Plan should identify and propose mitigating measures which will protect wildlife and other natural resources within the Resource Area from the impacts of field development and operations. We suggest that it should do so in conjunction with the EIS which is clearly required for oil and gas leasing within the Resource Area, as discussed under #5 above.

153-8

8) The RMP's analysis of oil and gas development impacts is critical. The development potential of this resource is clearly not speculative, nor a remote possibility. The RMP quite clearly indicates that the potential for major oil and gas developments is favorable. (p. 3-23) It also indicates that 131,196 acres are within KGS's. This fact further supports the need for the BLM to prepare an environmental impact statement as discussed under #5 above.

153-9

9) The document fails to adequately examine and analyze the cumulative adverse impacts of all energy development upon

153-9 wildlife. For example, Page A2-17 indicates that 37,960 acres of the resource area are unsuitable for coal leasing due to the presence of "severe winter range" for mule deer and elk. However, the maps on pages 3-24 and 3-25 indicate that large parts of this same area are within a Known Geologic Structure for oil and gas development, and the other areas considered unsuitable for coal leasing are not proposed for closure to oil and gas leasing. This is compounded by the fact that the Trapper Coal Mine is immediately adjacent to these properties. Given the extensive proposals for oil and gas development, the proposal for dramatically increased coal leasing, and the admitted threats to wildlife and other resources from these activities, the RMP's complete failure to examine, analyze, and propose effective management actions to mitigate the cumulative adverse impacts these actions is a serious problem which must be addressed. (See also, attached letter from RWF to Carol Macdonald, Team Leader, BLM, October 7, 1983.)

153-10 10) The RMP/EIS appears to fail to address the question of managing existing oil and gas leases within the resource area. While the RMP notes that over 90% of the RA is under lease (p. 3-23), no attention is paid to projecting the future development of these leases, their potential impact upon the environment, the legal authority of the BLM to restrict and mitigate the development of these leases, nor are any alternative proposals to implement such restrictions or mitigation measures considered or discussed. In fact, in areas which the Draft RMP otherwise concludes leasing and development should be restricted, no action is proposed for existing leases. For example, the discussion of the Vale of Tears area states that "the area would be open to oil and gas leasing with a no-surface-occupancy stipulation on new leases to maintain the semiprimitive values of the area." However,

153-12 Fundamentally, the coal management plan appears to be founded on "interest expressed by industry, proximity to existing and proposed coal leases, and exploration where resource data has been obtained." (p.A2-1) During this stage of planning, the delineation of the planning area should be based on coal resource information and multiple-use management, without the reliance on the "current interest of industry" that is indicated. (p.A2-1)

2) Overall, the RMP calls for considerably more concessions in renewable resources management than coal leasing often neglecting to protect crucial winter habitats, mating and parturition areas, riparian zones, and endangered species' habitats. For instance, comparing the environmental consequences of the energy/mineral alternative to those of the preferred alternative reveals that no concessions have been made to alleviate the potential surface mining disturbance to 70% of the aspen communities. Therefore, even in the preferred alternative there exists a high potential for significant adverse impacts to deer fawning and elk calving/wintering habitat. (p.4-22)

153-13 3) As mandated by the Endangered Species Act of 1973, all federal agencies must insure that federal activities do not destroy or modify habitat determined to be critical. In applying Criterion #11-Bald and Golden Eagle Nests, the plan states that buffer zones will be determined in consultation with the Fish and Wildlife Service. However, exception number three (p. A2-13) empowers the surface management agency to decrease those critical zones based solely on their appraisal that the eagle will not be adversely affected, neglecting the commitment to consult "the Colorado Division of Wildlife and the U.S. Fish and Wildlife Service before implementing projects that might affect threatened and endangered species

153-10 existing leases which are covered by a "wilderness study area" restriction would be allowed to develop their leaseholds -- and the was stipulation would be dropped from these leases. (See also discussion above of NSO var-application.) The RMP should address these existing leases, particularly for the areas which it has otherwise concluded that development should be limited or prevented.

153-11 11) The Little Snake Resource Area Umbrella Environmental Assessment for Oil and Gas Activities is an inadequate analysis of the potential impacts of development. Not only has significant time elapsed since the preparation of this document, but significant new events have occurred and new information is available to the BLM regarding oil and gas development. For example, the Draft Plan, itself, concludes that the cumulative impacts of oil and gas development pose substantial adverse impacts to wildlife. This conclusion calls into question the "finding of no significant impact" made nearly five years ago. The RMP/EIS cannot use this outdated and inadequate EA to substitute for its obligations to analyze the potential impacts of oil and gas development. Moreover, the EA cannot, under any circumstances, be used to substitute for BLM's obligations to develop a management plan which complies with the mandates of FLPMA.

#### Coal:

With respect to the Draft Plan's treatment of coal leasing and development within the Resource Area we have the following comments:

1) As in oil and gas development, a disproportionate management scheme is proposed for coal production.

153-13 habitat." (p.2-14) In order to prevent a "whittling away" of the pre-established zones, we recommend that all negotiations take place during the initial consultations with the FWS thereby establishing buffers for the duration of the RMP.

153-14 4) In addition, some confusion exists regarding the annual period of "no activity" to protect nesting golden eagles. While the results section stipulates closure between February 1 and July 31 (p.A2-13), the May 21, 1984 FWS letter (Exhibit B) calls for no activity from July 1 to February 15. Considering the seriousness of this stipulation, we request a correction of this misstatement be made.

153-15 5) In comparing the consultation letter from the Colorado Department of Natural Resources-Mined Land Reclamation Division with the application of Criterion #19: Alluvial Valley Floors, four stream sections which the state identified have not been recognized by the draft as either actual or potential AVFW (Tables A2-7 and A2-8). Despite the discrepancy, no explanation has been offered for the elimination of three sections of the Yampa and five sections of the Wilson from the state's recommendation. The plan should state why and on what basis the Bureau made these determinations.

153-16 6) In addition, the plan acknowledges that "because critical winter ranges are usually at or near carrying capacity, any disturbance that removes habitat or displaces animals would result in mortality." (p.4-22) Furthermore, with respect to critical wintering habitat, "the impacts resulting from mining would continue throughout the life of the plan because successful reclamation could not be achieved within ten years." (p.4-24) In actuality, successful reclamation of aspen-dominated habitat, the most important elk calving and deer fawning habitat in the resource area, has not been

proven.(p.4-77) Therefore, the Colorado Division of Wildlife recommends 504,620 acres (611,878 acres less overlaps with other criteria) be protected due to its critical habitat status.(Table A2-2) Yet, despite the Bureau's admission that mortality will result from any decrease in winter ranges, its acknowledgement cannot be achieved in a timely fashion, and that certain critical types of elk and deer habitat have not been proven to be reclaimable, the plan calls for protecting only 37,960 acres of critical miles deer, elk, antelope, and grouse habitat - less than 8% of the critical habitat identified by the Division of Wildlife. Section 522 of the Surface Mining Control and Reclamation Act provides that areas of the federal lands which cannot be reclaimed for technological and economical reasons should be designated "unsuitable" for surface coal mining operations. Given this legal mandate, plus the Authority granted in unsuitability criterion nos. 9, 10, 11, 12, 13, 14, and 15 to declare important wildlife habitats off-limits to coal leasing, we recommend that no leasing take place in any of the critical habitat areas identified by the Division of Wildlife. <sup>2/</sup>

153-10

<sup>2/</sup>The Draft Plan proposes to allow leasing in these areas based upon the incorporation of a stipulation in these leases. However, it is obvious that this stipulation cannot effectively address the question of cumulative impacts upon wildlife. This stipulation does not use "proven techniques" as recommended in the BLM's own Review of the Unsuitability Criteria. Moreover, since the Draft Plan indicates that critical winter ranges are at or near their carrying capacity, it would appear that the mitigation "promised" by the stipulations will be of limited effectiveness since other lands are not available within the Resource Area to replace disturbed acreage. Intensive habitat management has significant limitations which should be, but are not addressed, in the Draft Plan.

the responsibility of the BLM to incorporate all of these concerns in its planning process and therefore the BLM should respond to these comments as part of this RMP. Given the clear possibility that the BLM will not complete the Round II Regional Coal Leasing EIS, BLM should incorporate all comments and its responses to all comments on the Round II coal leasing EIS into this Plan. (See comments on Leasing by Application, *infra*.)

153-10

9) There are also major inconsistencies in the impacts analysis between the Round II Coal Leasing EIS and the Draft Plan. While the Draft Plan identifies some impacts from coal leasing in the Resource Area, it generally dismisses these impacts as unpredictable (air quality), "not significant" (soils), "short-term" (soils), "cannot be precisely determined" (water). For wildlife habitat, the Draft plan does appear to indicate that the potential adverse impacts from coal development are significant, however, the discussion appears to obfuscate this conclusion.

153-20

Yet, the Draft Round II Coal Leasing EIS concluded that there would be "significant" adverse impacts from new coal leasing to the following resources: "air quality, geology/topography/minerals, water, vegetation, wildlife, recreation, visual resources, land use, economics, social values, and transportation." (Draft EIS, pg. xii.) The Draft EIS also contains some fairly specific details about impacts to air quality posed by proposed lease tracts within the Resource Area, despite the Draft Plan's conclusions that such impacts are not predictable.

While, as noted previously, a direct comparison of these documents is difficult due to the significant number of changes in the coal leasing situation in this region, it is still

7) The Draft Plan fails to examine the potential impacts from the development of coal Preference Right Lease Applications (PRLAs) in the Resource Area. It does not appear that the unsuitability criteria have been applied to the pending PRLA's, for example. This is contrary to the recent statements of the Department of Justice before the U.S. District Court for the District of Columbia in Civil Action No. 82-2763. The Joint Motion of Plaintiffs and Federal Defendants to Establish A Schedule For Further Proceedings, dated April 22, 1986, states on page 2 that "the Department will subject lands covered by pending preference right lease applications to an unsuitability review."

153-17

8) The Draft Plan presents misleading and contradictory statements with respect to pending coal lease sales in the Resource Area. The document references the Draft EIS for Round II of Federal Coal Leasing in the Green River - Hams Fork Region. However, there have been major changes in the status of the existing and pending leases since the publication of this document which are not identified, and not analyzed in this Plan. For example, Map 3-2, pages 3-18 and 3-19, of the Draft Plan does not agree with the map presented in the Round II Coal Leasing EIS. Several tracts proposed for leasing have been leased, proposed lease tracts appear to have been re-configured, and other changes have obviously occurred.

153-18

It is impossible to comment on these changes without a clear discussion and analysis of these changes. We note that the Department has failed to respond to the comments of the Federation on the Round II EIS which were submitted on October 7, 1983. We attach those comments, and incorporate them herein. BLM must respond to the comments made in either this Draft Plan of the Final Round II EIS. We believe that it is

153-19

obvious that there are serious discrepancies between the Draft Plan and the Draft EIS regarding coal leasing. The significant impacts identified in the Draft EIS should be reviewed, updated based upon changes in the status of leasing in the Region, and incorporated directly into the analysis of the second Draft RMP for the Little Snake Resource Area.

153-20

10) The Draft Round II regional coal leasing EIS also indicates that the levels of potential impacts vary depending upon the amount of coal leased within the region. Given the fact that the wildlife and water resources of this Resource Area are facing serious and continuing degradation from energy development, it is incumbent upon the BLM to analyze and propose specific "thresholds" for impacts upon these resources. The BLM should analyze and identify the extent of coal (and oil and gas) development which these resources can tolerate, examine the effectiveness of potential mitigation, and propose specific thresholds for wildlife and water impacts. These thresholds should be detailed enough to allow the surface management agency to appropriately limit the coal (and oil and gas) leasing within the Resource Area.

153-21

The coal leasing program adopted by the Secretary of the Interior specifically calls for the adoption of such thresholds where appropriate. Given the severe problems of this Resource Area, they are definitely appropriate -- and must be analyzed, proposed, and adopted. This however, will require the BLM to conduct the analysis necessary for the public to participate in the development and adoption of these thresholds. For this reason, alone, the Draft RMP is so inadequate that publication of a revised draft is required.

11) The Draft Plan also does not appear to comply with the requirements for land-use planning adopted by the Secretary of

the Interior as part of the Federal Coal Management Program. The Resource Area should review in detail the specific requirements set forth in the Secretarial Issue Document, Federal Coal Management Program, January 1986, and the Federal Coal Management Program Final Environmental Impact Statement Supplement, October 1985.

153-22 For example, despite the fact that the study area incorporates lands under the surface management of the U.S. Forest Service, the Draft Plan does not indicate that consultation has been undertaken with USFS. Such consultation is required before publication of the Draft Plan. See Secretarial Issue Document page 23 and page 05-3a.

153-23 Another example is the Draft Plan's failure to conduct the "multiple resource trade-off screen." This requirement, adopted by the Secretary, is described in detail in the SID at page 41, and in the Final EIS Supplement.

12) The potential adverse impacts of coal development upon wildlife and water resources in the Resource Area are obviously significant. The Draft Plan, however, fails to adequately identify and analyze potential mitigation measures. The statements with respect to proposed mitigation measures are completely inadequate.

153-24 While the Draft Plan proposes to quadruple the acreage available for coal leasing, it fails to deal with significant and documented water quality problems, for example, which are the result of the current level of coal development in the Resource Area. In the discussion of the preferred alternative, the Draft plan states that:

water quality and watershed erosion control concerns would be identified and addressed through the use of

activity plans. The potential for salinity control projects on BLM lands in the Milk Creek, Vermillion Creek, and Little Snake River watersheds would be analyzed. Projects would be implemented where permitted. Nonpoint source management actions would be coordinated with federal, state, and local agencies. Plans would be developed for stabilizing known areas of high erosion on BLM lands where activity plans by user groups or BLM did not adequately address watershed concerns. (Draft Plan, p. 2-56)

153-24 While this is not the only discussion of water quality mitigation, the additional statements do not add much to this prescription. These statements are wholly inadequate. They do not present an analysis of the problems. They do not identify or analyze potential mitigation techniques, nor do they provide enough detail to even understand what is being proposed. (For example, what are the salinity control projects being considered.) In sum, the Draft Plan denies the public, and the National Wildlife Federation, any opportunity to review or comment upon BLM's proposed actions to resolve these critical environmental problems within the Resource Area -- if, in fact, the BLM has any concrete actions under consideration.

13) The Draft Plan fails to consider the clear probability that the Resource Area will not lease coal in the immediate future through competitive coal lease sales. Under the coal leasing program recently adopted by the Secretary of the Interior, federal coal regions can elect to lease coal by application. We understand that the BLM is actively considering this course of action for the Green River-Hansa Fork Region, which encompasses this Resource Area. Therefore, the document's attempt to ignore analyzing the potential impacts of coal leasing through incorporating the Draft Round II EIS by reference is misplaced. The entire analysis of coal leasing and development should be re-worked. It must provide both more detail and substantive analysis of the potential adverse impacts upon the human environment of such leasing and

153-25

153-25 prescribe specific management actions as part of its alternatives.

153-26 14) The Draft Plan fails to identify or consider the potential impact of the diligence provisions (including Section 3 of FCLAA) upon existing federal coal leases within the resource area. Several existing leases within the Resource Area are likely to be subject to termination or other penalties under these provisions of law.

153-27 15) The Draft Plan fails to apply the unsuitability criteria to the existing federal coal leases in the Resource Area. Section 522(b) of SMCR requires a review of all federal lands. SMCR's definition of federal lands does not distinguish between leased lands and unleased lands. As we have stated previously to the Department, the Department's decision to exempt leased lands from the unsuitability review is misplaced. (Comments of the National Wildlife Federation on the Draft Environmental Impact Statement for the Federal Coal Management Program, May 8, 1985, incorporated herein by reference.) The Draft Plan should be revised to comply with the clear requirements of SMCR that all federal lands be reviewed.

#### LIVESTOCK GRAZING:

The dominance of poor range conditions on inventoried acreage, the lack of data on the remaining acreage, and the existence of livestock/wildlife conflicts instill our dissatisfaction with the proposed grazing management outlined in the preferred alternative.

According to the RMP, 463,177 of the 844,241 acres surveyed (approximately 55%) are presently in unsatisfactory

condition. (Table 3-9) Furthermore, "if full grazing preference were utilized, there would be a gradual decline in the ecological condition of approximately 46% of the resource area." (p. 4-41) Although 97% (1,256,540 acres) of the Resource Area is grazed by domestic livestock, the Bureau has collected sufficient data to prepare allotment management plans on only 96,326 acres (less than 8%). (p. 4-41)

If current grazing levels are maintained, "conflicts would continue between big game and livestock on critical winter ranges on BLM surface representing 80% of the total in the resource area." (p. 4-21) This would result in "significant long-term reductions in pronghorn, deer, and elk in certain critical areas." (p. 4-26)

153-28 The RMP states that "the preferred alternative would result in a short-term adjustment of 11%, reducing existing grazing preference to 148,821 AUM. However, adjustments would not occur until additional monitoring studies verified the need for the indicated adjustments." (p. 4-18) Admittedly, an intensive plan for completion of inventory work and development of monitoring program is required. However, to maintain grazing preference on all of the allotments in the interim ignores the data that is already available. If the Bureau contends that insufficient data is available to determine the necessary adjustments, how was the "overall downward adjustment of 11% of the grazing preference determined (p. 4-15)?

Proposing a period of up to five years for determination of grazing capacity and an additional five year period for implementation of the adjustments (p. 4-13) appears to be a long-range stalling tactic designed to delay the inevitable changes which must take place. This may well serve the permittees who use these allotments, but it ill-serves the

public which has an interest in rehabilitating rangelands which have deteriorated as a result of decades of poor grazing management practices. Therefore, we recommend that the proposed 11% cut be implemented in those allotments where unsatisfactory range conditions and livestock/wildlife conflicts have already been determined. This action would allow for range conditions to begin improving, while the remaining inventory work was being completed.

In addition, the Bureau plans to implement land treatments on 111 allotments that include fencing, spring and reservoir development, and vegetative manipulation during the interim period (p. 4-26). However, the RMP admits that certain of these projects to improve grazing conditions for livestock "could have adverse impacts to wildlife" (p. 4-26). We recommend that the full impacts of these treatments be assessed by BLM's wildlife staff and the Colorado Division of Wildlife in an effort to avoid the artificial creation of more wildlife/livestock conflicts before financial commitments are made to faulty projects.

#### TERRESTRIAL HABITAT ANALYSIS/MANAGEMENT:

According to Section 202(c)(9) of FLPMA, the BLM is obligated:

to the extent consistent with the laws governing the administration of the public lands, coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies and of the States and local governments within which the lands are located. . . . In implementing this directive, the Secretary shall, . . . assist in resolving, to the extent practical inconsistencies between Federal and Non-Federal Government plans, . . . Land use plans of the

error-ridden process of plotting verbal descriptions on pre-existing maps. With the necessary set of maps already in existence, we find it totally unacceptable to neglect their inclusion in the draft RMP/EIS. Therefore, we recommend that either through a supplemental or revised draft, the public be provided access to these critical documents.

In response to the proposed management alternative, our primary concern is the obvious lack of surveys and therefore, information on which the plan is supposedly based. For example:

"only limited inventory of wildlife habitat condition and trend has been completed in the resource area. . . . Because of this small sample size, shrub condition across the entire resource area cannot be determined with any reliability." (p.3-43)

"no studies especially designed to determine forage availability have been conducted in the resource area." (p.3-45)

"the Little Snake Resource Area probably has the highest density of nesting raptors in Colorado; [however], no formal raptor surveys have been completed in the northwest portion of the resource area [where] observations indicate a high density of many species." (p.3-46)

"no inventories or surveys have been conducted on wetlands, aquatic, or non-game species habitat to determine the number of wildlife species, diversity, or habitat condition and trend." (p.3-44)

data on big game populations and acres of habitat are based on "very little [general] information [and] no information for winter and critical winter range." (Table 3-12)

In light of this deficiency of data, we question the validity of determinations of sustainable big game herds, special-use designations, and the reliance upon "wildlife habitat replacement stipulations" to mitigate the detrimental impacts of a commodity-biased preferred alternative. In addition, this lack of information severely restricts the

Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this Act.

According to a statement on page 5-3 of the draft EIS:

The current Management, Energy and Minerals, Commodity Production, and Preferred alternatives would conflict with the Colorado Division of Wildlife (CDOW) 1988 Strategic Plan objectives for big game populations by not providing the necessary habitat to reach and maintain CDOW's proposed population numbers.

Given this conclusion, in order for the final plan to comply with the requirements of FLPMA above, the final plan will have to be modified to satisfy the CDOW's 1988 Strategic Plan. This will generally necessitate a redirection of the plan toward less coal leasing, less oil and gas leasing, a reduction in livestock numbers in appropriate areas, and greater attention and higher priority to the restoration, maintenance, and proper management of riparian and terrestrial wildlife habitats.

Throughout the RMP, numerous land-use strategies are presented in map form: coal leases, oil and gas units, wilderness study areas, and others. In application of the State Resident Fish and Wildlife Criterion (#15), the plan acknowledges the use of a series of maps delineating severe winter ranges, concentration areas, migration routes, and production areas for mule deer, elk, antelope, sage grouse, and sharp-tailed grouse. (p.A2-16) Submitted by the Colorado Department of Wildlife, these maps show the extent of wildlife use in these areas and are an essential tool in planning habitat management. (p.A2-18) Despite the plan's admitted reliance upon these documents, no wildlife maps have been included in the RMP. Without these habitat maps, determining impacts to populations as a result of various management alternatives becomes an extremely difficult, tedious, and

amount of detail possible in proposed habitat management schemes as is evident in the nine proposed wildlife habitat actions of the preferred alternative. (p.2-64)

In summary, we find the available information totally insufficient on which to base a fifteen-year management plan. At a minimum, we strongly recommend a decelerated rate of oil, gas, and coal development; decreased level of livestock forage utilization; and accelerated rate of inventory and analysis of wildlife habitat in order to substantiate or refute reliance upon the outlined mitigative principles.

#### RIPARIAN ZONE/AQUATIC HABITAT MANAGEMENT:

As in other Resource Areas, riparian zone/aquatic habitat management should be a primary concern of the BLM in the Little Snake Resource Area. The scarcity of, importance of, and high demand for this resource dictates the need for a rigorous plan of analysis, maintenance, and rehabilitation of these important habitat areas. While less than .5% of the public lands within the resource area are considered to be riparian zones (p.4-27), their use as habitat for wildlife is disproportionate to their occurrence. Because BLM's riparian areas exist in arid and semi-arid regions, the water, food, and cover afforded by them are often very important habitats for a wide variety of game and non-game avian, aquatic, and terrestrial species. And because of their association with surface and subsurface water, they are generally very responsive to restoration efforts. Unfortunately, the proposals in the draft plan fall far short of the management attention this important resource deserves.

As in terrestrial habitat analysis, the deficiency of quantitative and qualitative data regarding riparian areas in



the Little Snake Resource Area is a very serious defect of the draft plan. Of the 3,550 acres classified as riparian zones, wetlands, and perennial aquatic habitat, only "50 acres along the Little Snake River have been formally surveyed." (p.3-43) While the EIS acknowledges the importance of these areas, its minimal attention to this critical resource indicates a severe lack of management priority.

In its limited discussion of riparian systems, the Bureau admits that "through long-term observations of a large majority [of riparian habitats] have been determined to be in poor condition. The only system that appears to be in good condition is a three-mile section of Beaver Creek which is located in a canyon that is inaccessible to livestock." (p.3-44) In fact, the portion of the Little Snake River that has been inventoried showed "little or no reproduction of cottonwoods was occurring and existing trees were mature or overmature. Willow and buffaloberry had been severely grazed." (p.3-43)

Given the fact that six of the eight threatened or endangered species which occur on the Resource Area are dependent to at least some extent on riparian habitat, and that numerous other fish and wildlife species within the Resource Area rely upon riparian/aquatic habitat for all or a portion of their life cycle, the monitoring, rehabilitation, and proper management of this habitat type should be of the highest priority. The Endangered Species Act expressly imposes on federal agencies a mandatory duty to "conserve" endangered species and their habitat. In turn the terms "conserve" and "conservation" are defined by the Act to mean:

to use and the use of all methods and procedures which are necessary to bring any endangered species or threatened species to the point at which the measures provided pursuant to this [Act] are no longer necessary. (16 U.S.C. 1532 (3))



## NATIONAL WILDLIFE FEDERATION

1412 Sixteenth Street, N.W., Washington, D.C. 20036 202-797-6800

October 7, 1983

Carol MacDonald, Team Leader  
Bureau of Land Management  
Little Snake Resource Area  
P.O. Box 1136  
Craig, Colorado 81626

Dear Ms. MacDonald:

The National Wildlife Federation (NWF) appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for coal leasing in the Green River-Hams Fork Region. NWF is a conservation and education organization with over 4 million members and supporters nationwide. Environmental impacts resulting from resource development are one of our principal concerns. Therefore, the effects of federal coal leasing in Colorado and Wyoming on the natural resources of that area represent a central issue for our membership.

The lack of adequate information and analysis in the DEIS has severely hampered our ability to provide you with extensive comments. However, the information that is provided points to a number of critical problems. Amongst these are: lack of demonstrated need for new federal coal leasing, inadequate consideration of related impacts resulting in an understating of the cumulative impacts of new leasing and insufficient mitigation procedures. In addition to the comments set forth below, we also incorporate by reference the comments filed on the DEIS by the Natural Resources Defense Council, the Colorado Open Space Council, and the Wyoming Wildlife Federation. These organizations have addressed these and other shortcomings of the DEIS which are also of concern to the National Wildlife Federation.

### Need for New Leasing

On page 5 of the DEIS it is stated that "The advisability of leasing additional coal while the current coal market is 'soft'... is beyond the purview of this document. The only other mention of 'need' appears on Page 1 of the DEIS. It indicates that there is some relationship between the proposed leasing levels and need by noting that the decision was made 'after analyzing potential production from planned and existing coal mines in the region and projected demand for coal.' However, it does not reference any analysis. Nor is it clear that there is necessarily any relationship other than temporal sequence between the phantom 'analysis' noted and the proposal.

Despite this legal obligation, no specific plans are scheduled for the necessary inventorying and development of intensive management schemes; the RMP merely states an intention to "prepare and implement habitat management plans as funding allows with emphasis on riparian/aquatic lands." (p.2-64)

153-34

We propose that the following steps be taken to correct this severe management deficiency: (1) preparation of a comprehensive inventory of the extent and condition of all riparian areas within the resource area, followed by (2) determination of management proposals for these areas, and (3) the implementation of such plans and the continued monitoring of riparian area status.

### CONCLUSION:

Given the critical deficiencies of the draft Little Snake RMP, we urge that the recommendations made above be assessed in a revision of this draft, prior to the issuance of a final plan.

ATTACHMENT: Comments of the National Wildlife Federation on the Draft EIS, Green River - Hams Fork Coal Region, Round II, October 7, 1983.

for new leasing. The DEIS then goes on to indicate that need was determined based upon a desire to "enhance industry competition" -- without any further elaboration. The final justification offered for the leasing levels is that BLM received expressions of interest in some 1.3 to 1.5 billion tons of recoverable coal -- a method of determining the need for new leasing specifically rejected in the 1979 Final EIS for the Federal Coal Management Program.

In short, BLM neither examines the need for new coal leasing, nor documents or references any pertinent analysis, nor does it present an analysis of why new leasing is necessary to "enhance industry competition." This oversight makes it impossible for us to determine what relationship the "alternatives" presented have to reality. Without some analysis of need and the relationship of these alternatives to meeting the need for new coal production, it is impossible to discuss the relative merits of the alternative proposals for leasing.

This omission is patently unacceptable, and a violation of NEPA requirements. The Department cannot abdicate its responsibility for analyzing the need for additional federal coal leasing and development. Further, federal regulations require that an EIS "...indicate those considerations including factors not related to environmental quality, which are likely to be relevant and important to a decision." (40 CFR Section 1502.23).

Clearly, the state of the current market and its effect on coal demand are highly relevant and important to any decision to lease federal coal (see *Natural Resources Defense Council v. Hughes*, 437 F. Supp. 981, 990-991, (D.D.C. 1977)). Without a detailed analysis of such current and future supply and demand scenarios, the Secretary cannot make an informed choice between the proposed alternatives. Furthermore, it is impossible for citizens and interested parties to comment on the relevance and reasonableness of the proposed alternatives.

The leasing of federal coal in this Region is not taking place in a vacuum. It is occurring in the context of additional federal coal leasing in adjacent regions, the processing of coal Preference Right Lease Applications (PRLA's), the leasing of state and private coal tracts, and the development of coal resources on previously leased or purchased lands. It is also taking place in the context of reduced energy demand projections, increasingly efficient energy consumption, the increasing availability of other fuel and energy sources, stagnation in the development of synthetic fuel production facilities and the development and use of alternative renewable energy technologies.

The analysis of the need for federal coal leasing in the 1979 FEIS for the Federal Coal Management Program does not satisfy the requirements of NEPA. First, that analysis does not examine the decision currently before the Secretary, and in fact that discussion cites extensive uncertainties about future coal supply and demand that make it inadequate for determining the need for coal leasing in this specific region at this time. Moreover, significant changes have occurred in coal markets, and energy demand -- such as those cited above -- which make previous analyses of the "need" for new coal leasing wholly inadequate. An indication of the significance of these changed circumstances is the change since 1979 in the projections for national coal consumption. The Department of Energy's National Energy Policy Plan's highest estimate of coal consumption for 1985 is now lower than the lowest projected level of demand in the 1979 FEIS. The changed circumstance which has led to a such a dramatic change in projections of coal consumption require the BLM to examine the question of need in this EIS.

The BLM must, at a minimum, document the need for new federal coal leasing, after an analysis of these and other factors affecting coal supply and demand.

This analysis must also indicate and explain the relationship of each alternative leasing strategy to the potential need for coal. The current document fails to even identify such a relationship between the alternative leasing levels and the need for new leasing, failing thereby to present meaningful alternatives.

#### Cumulative Impacts Analysis

##### 1) Major Omissions Understate Total Cumulative Impacts

The analysis in the DEIS appears to be constructed by defining a base case for potential impacts, contained in the "no action" alternative, and then incrementally adding the additional impacts of higher leasing levels to this base. However, the documents fails to adequately incorporate related effects of oil and gas development and the leasing of coal PRLA's in this analysis, thereby grossly underestimating the total cumulative impacts of the preferred alternative.

A detailed and complete data base is essential to the composition of a "no action" alternative. While the document displays considerable quantities of "numbers" which one might interpret to be data (see for example Table 2-1) there are often no references nor textual discussion which indicates the origin of the data. Other tables (see for example Tables 4-3 and 4-17) note that the data has been "estimated" or "inferred" from other sources. However no discussion is included in the

entire analysis that follows is severely deficient. Moreover, the potential impacts from all leasing alternative, including the preferred alternative, are thereby grossly underestimated.

##### 2) Soil

Table 4-R on page 132 indicates that fully two-thirds of the 16 tracts to be offered under the preferred alternative have low soil reclamation potential. However, it is stated on page 129 that "impacts to soils from coal development would be insignificant in the long term...." The lack of supporting information makes it difficult for us to judge the veracity of such an assertion.

The data available casts doubt on this potential outcome. Successful soil reclamation involves more than merely re-establishing a vegetative cover. The development of a natural soil profile is a process that often requires hundreds of years and involves complex geological, physical and biological actions. Given the adverse conditions in the study area (low precipitation, thin topsoil, and unfavorable soil chemistry) successful soil reclamation appear highly unlikely.

When this intrinsic low reclaimability is looked at in relation to baseline disturbance and the additional effects of proposed leasing it appears even less likely that soil impacts will be insignificant in the long term.

Almost 200,000 acres are expected to be disturbed in the "no action" alternative. To this figure one must add the additional increment for PRLA mining activities, the surface impacts of oil and gas development, and oil shale activities. Finally, the secondary soil disturbance totals must be greatly increased to reflect the fact that land use to meet the needs of energy-related population growth produces more impacts than does direct energy activity. (Energy From The West, Vol 1, EPA, March 1979, p. 116.)

The fact that these activities will be competing for scarce resources -- such as water -- essential to successful reclamation in this harsh region casts doubt on the reclamation potential of these lands. The absence of examination of this and previously mentioned points in this section represents a serious flaw.

##### 3) Water

The DEIS tries to downplay the effect of coal activities on consumptive water use and ignores significant outside claims on water. As a result, cumulative effects on this limited resource appear to be understated.

text to indicate the methods used in developing these figures. Simply, without a more detailed discussion and analysis it is difficult to judge these baseline "numbers."

Despite these problems it is evident that the baseline omits the 23 PRLA's in the study area. The fact that 12 of the PRLA's are being processed under separate environmental assessments is irrelevant. Their analysis in a separate document does not somehow remove them physically from the study area. In addition, what is the fate of the remaining 11 PRLA's? No specific documentation is given concerning the impacts that would occur should these leasing applications be granted and developed, and it is difficult to determine whether some or all of these PRLA's are included in the baseline assumptions. Given the significant acreage covered under all 23 of the pending PRLA's, their proximity to the tracts being proposed for leasing, and their impacts upon related if not identical resources, this oversight is very significant. If the BLM cannot determine, at this time, which PRLA's will be leased and developed, it should present a "worst case" analysis, and include in the EIS an assessment of the impacts assuming that all 23 PRLA's are leased.

Secondly, Table 2-1 (page 9) is wholly inadequate. It is almost impossible for us to comment on the accuracy of this baseline data given the paucity of information. At a minimum, coal projects should be supplemented with individual map references and acreage disturbance figures. "Tranium," "oil and gas," and "iron" projects need to be detailed with specific names, acreage data, and map references. Based on our recent communications with the BLM, however, the table appears to vastly underestimate oil and gas leasing in the region and therefore understates the related development impacts of these leases. In addition, the DEIS should consider the fact that the Department continues to persist in preparing to lease substantially greater acreage for oil shale development.

In all of these cases, the DEIS should include a breakdown of the baseline impacts attributable to each activity considered, and a narrative description on how the estimates indicated were developed including references to the appropriate literature.

In sum, the lack of detail and discussion in this section makes it impossible for us to determine with certainty whether the baseline is truly representative of a "no action" alternative. However, a cursory examination leads us to believe that the baseline effects are understated -- particularly as they underestimate the impacts from oil and gas development and PRLA development. Since the environmental impacts under this alternative are misrepresented, then the

The assumption underlying the consumptive water use analysis is unsupported and appears unwarranted. Since evaporation and transpiration still occur irrespective of mining activity, consumptive uses would be increased by coal development -- not exchanged.

Also, the water needs for reclamation of disturbed acreage in areas of low precipitation are ignored. These water claims could exceed those estimated in the DEIS, strain the water capacity of the study area, and effect water use downstream.

The cumulative effect of salt loading on water quality is also important. Small salinity increases are extremely significant in streams and rivers that are already salt laden. Salinity increase projections range from one to 32 percent in the affected watersheds. Inadequate data is provided to determine the effects of new federal coal leasing on salinity. These effects, however slight, could have adverse impacts in the study area when viewed in the context of total salinity increases. In addition, the downstream regional effects could be even more serious.

The DEIS appears to grossly underestimate the potential impacts from salt loading. While the document concludes that water from the Yampa River would be suitable for all uses (pg 141), the Kanan Tempo Report (1982) clearly contradicts this assertion. In fact, the discussion of salt loading appears to virtually ignore the conclusions of this report, which is only noted in relationship to TDS (total dissolved solids). A complete re-examination of the salt loading problems which will be created by new leasing is essential, and should begin with a careful examination of the Kanan Tempo Report and its implications for the region.

##### 4) Wildlife

The cumulative effects of resource development on wildlife are particularly troubling. Habitat losses are downplayed in the DEIS -- animal populations are assumed to suffer only temporary, local setbacks. Successful reclamation is expected to result in the quick re-establishment of wildlife.

The DEIS fails to consider "temporary" habitat losses in the context of increased hunting and poaching pressures and loss of alternate habitat. Large human population increases in the study area will result in proportional increases in hunting pressures, and equal or greater illegal harvesting of big game animals. (see Wildlife Technical Report for the Riley Ridge EIS, BLM, May, 1983, p. 2-14).

The DEIS makes the largely unsupported claim that animal populations will be "displaced." Such an assertion ignores a

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number of important factors. Wildlife populations may have reached carrying capacity on adjacent habitats, rendering displacement impossible. Increased grazing pressure could render certain areas unsuitable for wildlife. Land use decisions within or adjacent to the study area may result in "double displacement." A population which has already been forced to move once, or whose migration route has been detoured, may not be able to return to its original habitat or adapt to additional complexities in its environment.

In fact, the 1980 FEIS for the first round of leasing in this region concluded that "many critical winter ranges are at or near carrying capacity and, therefore, may not support the additional animals that would be displaced..." In light of the increased coal leasing, and increased oil and gas activity in this region, the assertion that animal populations will only be temporarily displaced without significant lasting impacts is questionable and contradictory to the Department's prior conclusions. This is particularly significant due to the fact that several of the tracts proposed for leasing directly impact critical wildlife habitat.

A true "worst case" scenario would analyze the cumulative impacts of all of these factors, in light of all of the development likely to occur in the study area during the life of the proposed leases. We are particularly concerned that the whole may be greater than the sum of its parts -- each animal lost could become proportionally more important to the survival of the herd as populations are reduced. Given the vital recreational and economic importance of wildlife in this region, this question must be more thoroughly and carefully addressed in the DEIS.

#### Inadequate Mitigation

In relation to the previous discussion of potential cumulative impacts, the mitigation procedures proposed in the DEIS are insufficient.

Given the fact that soils in Wyoming have low reclamation potential, it is not enough to hope that "advanced techniques" will be fortuitously developed. Mere exhortations for "more research" are not sufficient mitigation procedures under 40 CFR Section 1502.16(h) and 40 CFR Section 1508.20. This section must be re-written to show what technology is available to re-establish a self-renewing vegetation community on disturbed soils.

The analysis of mitigation procedures for water resources is equally inadequate. No discussion is included of point-source pollution control and conservation of water as alternatives to the construction of supplemental water storage

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projects. As a nostrum, dam building in this area has been proved neither feasible nor desirable in the DEIS. Indeed, the environmental problems caused by such projects might be greater than the impacts they were intended to solve. In addition, stipulations should be included in the DEIS to assure that no federal coal leasing will take place until urban wastewater treatment plants are able to handle increasing demands.

We have two reservations in regards to the proposed habitat recovery and replacement plans for wildlife. First, it should be noted that the detailed analysis of species diversity and habitat carrying capacity required of the lessee should be carried out by the EIS team and included in the DEIS under 40 CFR Section 1502.15 and Section 1502.22. Second, the specific terms of such habitat recovery and replacement plans should be spelled out in the DEIS in order that they might be subject to public comment. We cannot assess the ultimate effectiveness of wildlife mitigation procedures until we can scrutinize the proposed plans.

#### Conclusion

Because of the inadequacies and omissions in establishing the need for further federal coal leasing, baseline data, cumulative impact analysis, and mitigation procedures, NRP believes that the DEIS is an insufficient document for determining the environmental impacts of the proposed federal coal leasing alternatives. In fact, the DEIS is so deficient that while appearing to meet the procedural requirement for public comment, it substantively deprives us of the right to comment on the proposed alternatives. As such, it does not meet the requirements of the National Environmental Policy Act or the Federal Coal Leasing Amendments Act.

The DEIS should be extensively supplemented, redrafted, and re-issued for public comment. The data base needs to be significantly expanded in the areas previously discussed in these and the referenced comments.

We appreciate your consideration of these comments, and look forward to reviewing the DEIS when it is re-published for public comment in the future.

Sincerely,

*Mark Chester*  
Mark Chester  
Public Lands and  
Energy Division

*Karl Gawell*  
Karl Gawell  
Public Lands and  
Energy Division

#### Northwest Colorado Ranchers Association

c/o 555 Breeze Street Suite 210 Craig, CO 81625

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May 8, 1986

Mr. William Pulford  
Bureau of Land Management  
Craig District Office  
455 Emerson Street  
Craig, Colorado 81625

RE: Little Snake Resource Management Plan and  
Environmental Impact Statement

Dear Bill:

By this letter I am transmitting the comments of the Northwest Colorado Ranchers Association to the Little Snake Resource Management Plan and Environmental Impact Statement, which comments are due by May 9, 1986.

The Northwest Colorado Ranchers Association is a non-profit organization composed of ranchers in the northwestern part of Colorado. I am the President of the organization.

For purposes of preparing these comments, the Association retained the assistance of Dale R. Andrus Associates. We also retained Becky Love Kourlis as our legal representative.

Of course, any of us will be available to you or your staff for purposes of discussing our comments and the changes which we propose. We know that our comments will be taken with the regard which they are due, in that we represent members of the third largest industry in the area.

Thank you for your consideration.

Sincerely,

*Dean Visintainer*  
Dean Visintainer, President  
Northwest Colorado Ranchers Assoc.

/s/

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#### COMMENTS

DRAFT LITTLE SNAKE RESOURCE MANAGEMENT PLAN  
AND ENVIRONMENTAL IMPACT STATEMENT  
AND  
WILDERNESS TECHNICAL REPORT

BY

NORTHWEST COLORADO RANCHERS ASSOCIATION

## OUTLINE

- I. General Statement
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- III. Forage Utilization
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- VIII. Summary

## 1. General Statement

We appreciate your invitation to comment on the Draft Little Snake Resource Management Plan and Environmental Impact Statement.

We had hoped to be more involved on an individual basis in identifying the issues and suggesting recommendations during the planning process in regard to our individual allotments and ranch operations. We believe that your planning effort would have benefited from the experience and information we could have contributed from the grass root level.

After reviewing the draft RMP/EIS Statement, the Northwest Colorado Ranchers Association is submitting for your consideration comments for use in development of your subsequent statement.

Any planning document that addresses the numerous complex resource management issues concerning 31 million acres should be voluminous in size, so we were not disappointed in that regard, and you and your staff should be commended for taking on a task of such magnitude.

Our review of the documents, however, indicates that it is very difficult to comprehend and to track management actions. This is due to inconsistencies in analysis and application of rationale, numerous errors, misleading information or facts and errors made in transposing data from your working documents to the companion alternative maps. It also appears that your information base in some situations is very sparse and you allowed subjective judgement to take its place. Therefore, we question many of the proposed actions and conclusions reached.

There are numerous statements made in the document that indicate a definite bias or preconceived view point, intentional or not, by some team participants against some users or uses while favoring others. In fact we are beginning to wonder what has happened to the "Good Neighbor Policy" which was going to be pursued by this administration.

## II. Land Use Designations

## A. Management Priority Areas

The concept of Management Priority Areas appears to have merit in managing some resource values within a given geographic area. Resources such as coal must be developed in place. It would be only prudent to consider coal before developing other conflicting resources and investing large amounts of capital i.e. a new town, power plants or costly wildlife or livestock improvements. A prudent person would consider amortizing all investment costs. However, coal and other mineral resources found in place should not automatically be given a priority

1.

- 154-1 over other resource values or their use. The accumulative impacts of the proposed action should undergo a rigorous economic analysis before any kind of determination of use is made. It is noted on page 1-4 "Management Priority Areas. . . They do not automatically exclude other resource uses. Examples of priority areas include: critical mule deer ranges, sage grouse strutting grounds, easily accessible and economically viable mineral deposits, or areas that may be particularly responsive to livestock grazing management practices." This statement made some sense until we compared one alternative to another and found that oil and gas is going to be developed in the Preferred Alternative foregoing soil and water and livestock, which was not recognized as being valuable in the Energy and Minerals or other alternatives. See I.II N. R. 100 W.
- As noted under inconsistencies some resource values appear to be recognized based on subjective analysis i.e. oil and gas, recreation and wildlife, while other resources must meet a rudimentary economic analysis before being given any consideration as a Management Priority Area. It is apparent that in applying the Management Priority Areas concept you must have definitive and non-contradicting guidelines as well as a well trained work force that has an intimate on the ground knowledge of the planning area. This appears to be a must if continuity is to be expected throughout the process.
- 154-2 In the Little Snake Resource Area, all resources or their use have been made subservient to a single use, over vast geographic areas with limited information. This action is tantamount to land classification or zoning. Recognizing that the compatible use in a Management Priority Area will probably be developed over time (10-20 years) without conflict, why is it necessary to make a single use dominant at this time? We suggest that the Management Priority Area concept should be restricted to those areas where factual data is available so informed decisions can be made within a reasonable time frame i.e. 3 to 5 years. All other areas being retained for administration by BLM should be designated as Multiple Use Areas. Application of the concept in this manner will achieve the same result without jeopardizing the individual rights of private land owners or other users.
- The concept is actually addressing management concerns not priorities and should be restricted to internal use by BLM. The way TE is being used in the Little Snake RMP/EIS it connotes a single resource use concept to the general public which may result in increased trespass and other land abuses. Our point was validated by Bureau personnel in discussions with them while gathering information to support our comments. They all talked in terms of single use.

2.

- 154-2 If your current personnel are talking in terms of single use, what will the next generation, without the background of this effort, call it - dominate use? It appears that, if continue, "Multiple Use" will be placed on the endangered species list.

We recommend that the concept, as well as its use, be set aside until the Director of BLM has an opportunity to assess its use and end results.

## B. Federal Mineral Constraint Areas (FMCA's) (1) (2)

- 154-3 We oppose the use of FMCA's as defined in the RMP/EIS because it doesn't recognize the individual surface owners rights as presently defined and they could have an adverse effect on the economic stability of the farm and ranching community. What you are trying to accomplish can be done by imposing special or standard stipulations on the users of the public lands on a case by case basis if and when a conflict evolves. May we also suggest that you do not have sufficient actual use data to support your broad brush conclusions.

- 154-4 We reached this conclusion after reviewing the supporting data for the fragile soil and water areas in the Preferred Alternative, where realistically you suggest that all new activities within the areas be handled on a case by case basis. Why didn't you use the fragile soil and water areas in your analysis for the other alternatives?

It appears that the soil and water management priority areas (FMCA 2) could also be challenged for similar reasons. May we suggest that both of these categories be dropped.

## C. Wilderness

We fully support the recommendation for designation of Diamond Breaks as a Wilderness Area and non designation of the other seven Wilderness Study Areas.

We agree that these seven areas do not meet the Wilderness criteria and can be managed administratively. This would provide a wider range of recreational uses to a much larger sector of the public and would be less restrictive to other resource uses.

It is our position to oppose designation of Cross Mountain as a Wilderness Area until the water rights issue concerning Wilderness Areas, as set forth in Mike Strang's Bill before Congress, has been resolved. We feel that designation would adversely impact the future growth of the cities of Craig, Hayden and Steamboat Springs.

## D. Corridors

3.

- 154-6 Although we agree with your philosophy of management by exception for major rights-of-way and also off road vehicles, it is not compatible with the adjoining resource area RMP/EIS's. The other resource areas have identified major rights-of-way corridors.

#### E. Special Management Areas

On page A22-1 thru 4, under Special Management Areas, the statement was made that "Rare plant associations are critically imperiled in Colorado because of its extreme rarity and is rare and restricted throughout its known global range. . . ." The stands still in existence are threatened by livestock grazing." (Emphasis supplied) This statement was made in several of the Special Management Areas.

- 154-6 One of these areas, Limestone Ridge, is also a Critical Wildlife Area. Page A22-2, 6th paragraph, states "Limestone Ridge is critical winter range for elk and has been identified as an elk concentration area". Page 2-64, under Wildlife Habitat it states "Limestone Ridge would be designated as an RNA to protect high value elk winter range and an important elk concentration area", yet in every instance the entire blame was attributed to livestock grazing as being a threat to these rare plant associations. Wildlife, especially elk, on Limestone Ridge were not mentioned as being a threat, which very well may be your problem.

Those plant associations may have occurred as a result of many years of grazing. The assumption that rare plants were more abundant before livestock grazing, does not acknowledge that livestock can enhance certain plant species by grazing competing plants.

#### F. Special Recreation Management Areas (SRMA)

- 154-7 Little Yampa/Juniper Canyon Area - Establishing a recreation area at this location could result in numerous conflicts between the recreation user and the private land owner because of the intermingled private property throughout the canyon. Of primary concern is impacts that the recreational use can have on the operation of Duffy Ditch.

- 154-8 It is suggested that you re-assess this proposed recreation area with the private land owners in the area to gain their views on liability, access, trespass and other general management problems before issuing your subsequent report.

Our position is to oppose designation of this area as an SRMA until the water rights issue concerning Wilderness Areas, as set forth in Mike Strangs Bill before Congress, has been resolved. We also would oppose designation of this area

4.

The following inconsistencies are noted:

Page 2-64 shows 61,000 mule deer would be provided forage on BLM land out of a total of 102,000 mule deer for the total resource area.

Table 3-12 on Page 3-44 shows a total population of 105,700 mule deer, 63,400 of those are on 1,009,000 acres of BLM land. Total deer population and numbers on BLM are inconsistent between Page 2-64 and Table 3-12.

- 154-10 Page 2-64 shows 18,400 elk would be provided forage on BLM land out of a total 18,400 for the total resource area (this is inconsistent with 30% on BLM land).

Table 3-12 on Page 3-44 shows a total elk population of 21,500 with 6,700 elk on a total of 734,000 acres of BLM land. 30% of 21,500 is 6,450 elk on BLM land.

Page 2-64 shows 7,500 pronghorn on BLM out of a total for the resource area of 7,500. On Table 3-12 a total of 8,400 pronghorn with 6,300 on 707,000 acres of BLM lands. 7,500 pronghorn on BLM does not agree with 75% as stated on page 3-44.

Page 2-64 and Table 3-12 are in agreement for Bighorn Sheep.

The differences for mule deer, elk and pronghorn between Page 2-64, table 3-12 and percentages on Page 3-44 are not explained. Why do these differences exist?

#### IV. Water & Soil

##### A. Riparian

It is very difficult to address the Riparian Issue because it is treated so generally throughout the text, such as, 3,000 acres of riparian systems and 150 miles of perennial aquatic habitat in the resource area. But, then you identify individual allotments in table A9-1, the problems and what must be done to correct them. For example, under Management Opportunities/Action, Reference Number 3, you identified protective fencing or development of range improvement projects. Why didn't you also mention grazing management systems for riparian being studied by Dr. Skinner at the University of Wyoming? We understand that BLM is cooperating in this effort and progress is being made.

- 154-12 Many of your statements are not factual and are misleading, such as, the one on page 3-44, 1st paragraph, "Although other riparian systems have not been formally surveyed, through long

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If it would preclude construction of the proposed Cross Mountain - Juniper Water Project.

#### III. Forage Utilization

##### A. Livestock

Nearly all livestock use in the western part of the Little Snake Resource Area is during the dormant stage of plant growth as compared to wildlife that use the forage yearlong including during the growing season when grazing is most detrimental to plant growth. Competition between wildlife and livestock as to forage use is not properly analyzed. Livestock are generally blamed as the sole source of adverse effects on forage.

- 154-9 Big Game have a continuous impact by staying in certain areas for long periods of time. Livestock can be managed so that they will not concentrate in one area. Big Game cannot be excluded from blame for causing damage to forage.

##### B. Wildlife

On page 3-44 of the EIS under Big Game, the last paragraph states that "The following percentages were estimates of big game, use of public land in the resource area: 30 percent of the elk population, 60 percent of the mule deer population, 75 percent of the pronghorn population, and 100 percent of the bighorn sheep population" also stated is that "All big game population estimates for the total resource area were provided by the Colorado Division of Wildlife. Population estimates for BLM land only were calculated by BLM".

On page 2-64 under Wildlife Habitat (Issue 2-2) Item 1 states that "Forage would be provided on BLM land to maintain approximately 61,000 mule deer, 18,400 elk, 7,500 pronghorn and 70 bighorn sheep, which would contribute to total resource area big game populations of 102,000 mule deer, 18,400 elk, 7,500 pronghorn, and 70 big horn sheep".

- 154-10 On page 3-44 "Table 3-12 shows population estimates and the acres of range for the four major big game species in the resource area."

The figures shown in the table are as follows:

	Total	BLM	Total	BLM
Elk	21,500	6,700	2,327,000	734,000
Mule Deer	105,700	63,400	2,340,000	1,039,000
Pronghorn	8,400	6,300	1,624,000	707,000
Big Horn Sheep	70	70	24,960	21,760

5.

- 154-12 Some observation, a large majority have been determined to be in poor condition. The only riparian system that appears to be in good condition is a 3-mile section of Beaver Creek, which is located in a canyon that is inaccessible to livestock". (Emphasis supplied)

One of our livestock members uses that 3-mile section every year. There is, for your information, a livestock trail in that canyon. Because of the foregoing and other very general statements about riparian, we question how you can condemn livestock based on only 20 riparian vegetative transects when wildlife are concentrated in many of the same areas (see Appendix 16).

#### V. Socio Economic

##### A. Economic Values

Page 3-70, and page 3-71, Table 3-20 and 3-21.

- 154-14 The economic value of recreation in the Little Snake Resource Area is very biased and deceiving by including skiing as a recreation value in the amount of \$73 million. This value plus other values are derived from private and National Forest Lands and are not related to the public lands administered by Bureau of Land Management.

Page 3-80, Table 3-29. 1982 Agriculture Earnings shows livestock products for a total of \$8,948,000 for Moffat County and \$8,776,000 for Routt County and Tables A13-2 and A13-3 depicting gross livestock revenue. These figures are not consistent with the recreation figures that are shown as economic value. It is stated on Page 3-70 that "Table 3-20 is an attempt to show the value of recreation so that its relative significance can be compared to other resources".

- 154-16 Since a similar table on economic value has not been prepared for other resources and the recreation use on lands administered by BLM is a very small portion of the total represented by Table 3-20, it does not represent a fair comparison therefore this table should be eliminated. As an alternative, a table representing income by sector, as shown in the Kremmling RMP/EIS, is recommended.

Livestock production is the third most prominent and probably the most stable industry in the Resource Area. Through inconsistent application of data leaves the impression that it is of less economic importance than recreation or any of the other industries of the area.

##### B. Accumulative Impacts

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In review of the document it appears that many federal Management constraints have been imposed on the private and/or state owned lands without consideration of the accumulative economic impacts. The FMCA areas are an excellent example of the foregoing situation. The Federal Government (BLM) is imposing management constraints on its mineral estate to protect wildlife habitat on privately owned lands which will directly effect development of the mineral estate on adjoining private properties. For example, the private mineral estate standing by itself may not be an economic unit, but if added to the federal mineral estate it would be a viable unit.

We appreciate your concern for wildlife habitat but it should be restricted to the surface estate under your management. By using the FMCA concept it appears that you are indirectly zoning private property for wildlife. The zoning function on private surface is the function of the state and county. Taking it one step further, you may in fact be usurping individually private rights.

It appears that your concern for wildlife habitat and the wildlife species is so overwhelming that you have neglected human needs and their property rights. An example of the effects of recognizing wildlife areas (FMCA's) on private surface, it does not recognize the special need to the land owner for critical livestock areas for landing and calving grounds.

Some of these areas are in:  
T. 8 N. R. 90, 91, 94, 95 & 96 W.  
T. 9 N. R. 90, 91, 95 & 96 W.

Congress recognized in the Surface Mining Control & Reclamation Act of August 3, 1977 the rights of qualified surface owners. The Act made the federal mineral estate subservient to the individual surface owner rights by mandating that the Federal Government get the consent of a qualified surface owner. You are utilizing the subservient mineral resource to dictate the land use which appears to be contrary to Congressional intent.

The same situation and rationale is applicable to the FMCA (2) Soil and Water Resources.

#### VI. Data

##### A. Wildlife Numbers

Page 3-44, Terrestrial. The time frame used for determining population estimates for wildlife is inconsistent.

The population estimate for deer was derived from a 20 year average time frame, from 1963 thru 1983. Elk and Pronghorn

8.

populations were estimated from a 5 year average from 1979 to 1983. In order to be consistent, 20 year historical data should also be used for Elk and Antelope instead of using a 5 year period that was the peak period for Elk and Antelope. As an example, Wildlife numbers in the Boxelder, Duffy Mountain, and South Duffy Mountain Allotments in 1972 were for all practical purposes non-existent. In 1973 there were 50 elk during the winter. In 1978 there were 150. In 1983, there were 1,500 elk. Antelope first appeared in 1971 on Boxelder. Since then due to prohibited hunting until 1984 there are 300 or more and they continue to move south into the South Duffy Allotment.

The BLM assumes that all figures from CDOW are factual and use them to allocate vegetation between big game and livestock. By accepting these figures that have not been validated, by default, they are delegating their management responsibility to the state.

It should be noted that a policy change by the Wildlife Commission considered to be minor may have a significant impact on herd numbers, composition and use areas which would result in a sizeable increase or decrease of numbers in a short span of time in an allotment.

The acceptance of the CDOW numbers carte blanche for any given season may have a drastic effect on vegetation considered to be in balance by BLM. It is recommended that changes in Wildlife Commission policy such as the 4 point elk harvest policy in Northwest Colorado be subjected to an accumulative economic impact analysis. What the state may feel is good for its big game image and hunter enjoyment may be contrary to good management.

##### B. Forage Inventories

1. Range Forage Inventories made in the Douglas Mountain Area in 1978 and 1979, after extreme drought conditions, are not representative of the true grazing capacity or forage condition. There are reports that these inventories may be under rated by as much as 200 to 300%.

154-22

Similar drought conditions existed in the Bookcliff Wildhorse Range in 1974 and in the Royal Gorge Resource Area in 1979. The range specialists did not identify all of the plants nor their density, which resulted in inappropriate reductions in livestock and wild horses. These two situations were brought to the attention of the State Director and Bureau Director and later corrected at a great cost to the Bureau and livestock industry.

We appreciate the need for standardizing guidelines among

9.

Federal Agencies and we do not fault BLM for using SCS guidelines for range forage inventories. However, these guidelines do not recognize annuals, introduced species i.e. Crested Wheat Grass, and Big Sage which are a major food source during certain seasons of use. These plants are critical to both wildlife and livestock on many of the western range lands, therefore we believe some credit should be given to these plant species on an interim basis while managing to achieve a more desirable plant composition. For example, by maximizing use of livestock during certain periods of the year it may help you achieve your management objectives. Numbers and time of year can be addressed in the Allotment Management Plan (AMP) or Habitat Management Plan (HMP).

154-23

This type of rationale, in our opinion, would increase the anticipated short term grazing level. This increase depicts more realistically the actual vegetation available and it is more compatible to your long term objective of 163,493 AUM's. The grazing levels will, of course, be validated through your monitoring system with the livestock operator.

##### C. Inconsistent Data and Analysis

Appendix 9 "Range Management Opportunities and Actions" does not appear to have been given much thought by anyone familiar with range management opportunities, methods, and practices. It is readily apparent that two of the resource problems identified under "Resource Problems/Conflicts" are duplicated, no. 12 vs. 14 and 13 vs. 15. No. 13 should be combined with no. 5 and no. 11 should be combined with 12 so that the management opportunities can be readily compared to the resource problems identified in Table A9-1. It appears that the team went out of its way to identify range problems and forgot the purpose and intent of this appendix.

154-24

Discrepancies in Management Priority Areas: Soil (SOL), Watershed (WIR) and Fragile Soil and Watershed Areas (FRAG) appear on the Management Priority map legends in each of the alternatives. Soil and Watershed although shown separately in the legend are lumped together on the maps. The fragile watershed areas are shown only on the Preferred Alternative map. It is difficult to determine the rationale used in establishing priority areas in the following examples.

In the Preferred Alternative there is no wild horse area shown on the map although on Page 2-64 Wild Horses (Issue 2-4) states "Habitat Conditions would be managed to allow a herd objective of 160 wild horses".

154-25

The Natural Environment Alternative depicts wild horses in areas shown as Soil and Watershed and fragile watersheds on the Preferred Alternative map. Why are you increasing

10.

Wild horse numbers to 470 in the Natural Environment Alternative? This doesn't appear to be within the Alternative definition.

154-26

T. 10 & 11 N. R. 96 W. - areas are shown as Oil and Gas in the Natural Environment Alternative. This same area is shown as FMCA (2) on the Preferred Alternative map. Why?

154-27

T. 9 N. R. 95 W. and T. 11 & 12 N. R. 102 & 103 W. - areas within those townships shown as Oil and Gas in the Preferred Alternative are shown as wildlife priority areas in the Commodity Alternative. Page 5-2 of the RMP states that the Commodity Production Alternative would emphasize both mineral and livestock production from public land. It appears that these designated areas should be reversed?

154-28

T. 11 N. R. 100 W. - areas in this township shown as Oil and Gas priority areas in the Preferred Alternative are shown as livestock grazing priority areas in the Commodity Alternative. Why were these uses reversed since the Commodity Production Alternative emphasized both mineral and livestock grazing?

154-29

Soil and Water Resources (Issues 2-5 & 2-6)  
In tracing the above issues through the various alternatives the following inconsistencies were encountered.

Current Management Alternative - Fragile soil and water areas are not mentioned. Apparently the areas covered are referring to Soil and Watershed areas.

Energy and Mineral Alternatives - Fragile areas are not mentioned. Inventories and monitoring will be initiated but again apparently on Soil and Watershed areas since Fragile areas are not mentioned or identified.

154-30

Commodity Production Alternative - Again Fragile Soil and Watershed areas are not mentioned.

Renewable Resource Alternative - First mention of Fragile areas for a total of 58,000 acres. These areas were not located on the Renewable Resource Alternative Management Priority Areas map.

Natural Environment Alternative - Again Fragile Soil and Watershed were included in the amount of 47,000 acres but were not shown on the map.

Preferred Alternative - Fragile areas are discussed in this alternative, but no acres were identified in the text, however, large areas are shown on the map.

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154-30

The above inconsistencies raise the question of why Fragile Areas were shown on the Preferred Alternative NPA map but not on the Renewable Resource Alternative or the Natural Environment Alternative maps even though specific acreages were identified in both alternatives.

154-31

Common to all alternatives Livestock Grazing Page 2-6 states that livestock grazing priority areas were chosen only from 1 Category allotments. Our first question is why "M" Category allotments should not be included because according to Appendix 7 they have high to moderate potential for livestock forage and no major resource conflicts, but in validating our concern we find that you have included "M" Category allotments. See Table AB-2, page AB-10, Allotments 4303 and 4304, therefore, your management priority guidance as defined does not apply for livestock grazing. Conversely, on oil and gas you state that the priority areas include known geological structures and oil and gas units. These lands contain known or potential oil and gas reserves, but instead of restricting your analysis to fact, it appears that through subjective judgement and the application of geologic inference, any sedimentary basin can qualify for oil and gas.

#### D. Errors in Text and Tables

Numerous errors appear to exist throughout the document, including typographical as well as how the information is used in arriving at the conclusions reached. We selected, at random, allotment number 4206 and traced it through Appendix 6, 8, 9, 11 and 12 to determine how the process worked and what would happen within the allotment. Our findings are listed below:

Page A6-8, Table A6-2, a typographical error 4602 East Powder Wash should be 4202.

Page AB-8, Table AB-1, columnar information under each heading is misplaced.

154-32

Page A9-2, Reference numbers used to identify "Resource Problems/Conflicts" duplicated no. 12 vs. 14 and no. 13 vs. 15. See item 1 under "Inconsistency in forage analysis".

Page A9-3, Table A9-1, should be changed to reflect corrections mentioned above.

Page A11-1, A11-8, A11-14, and A11-20, data used in analyzing the structural projects in each alternative is identical, except in the Preferred Alternative where 70%

12.

154-32

of the structural projects have been dropped - (3 reservoirs, 4 miles of fence and one well), but the results are the same a "gain" of 410 ADM's. The conclusions reached doesn't appear to be rational.

Page A12-1, Table A12-1, The variations in short-term and long-term forage available appear to support our finding in the above paragraph.

Page 5-3-12, Table 5-1, Issues should be identified by reference number.

#### VII. Team Participation

##### A. Employee Qualifications

There appears to have been a number of changes in personnel during the preparation of the Little Snake Resource Management Plan which has affected the use and continuity of data and in some instances resulted in the lack of objective analysis due to unfamiliarity to the Resource Area.

The Project Manager, Assistant Manager and Team Leader have had experience with the environmental impact statement process but primarily in other states and on other types of efforts. Only three members of the Little Snake RMP/EIS team have had experience in more than one grazing EIS from the other three Resource Areas in the Craig District. Those are editor - Robert E. Woerner, the social values specialist - David "Pete" Gates and the threatened/endangered/sensitive plant species - Karen L. Wiley-Eberle. The Planning Specialist with a basic understanding of the Management Priority Areas concept and functional specialists participating in other district efforts are obviously missing.

Some of those participating in the Little Snake RMP/EIS effort do not appear to have understanding or familiarity with the Resource Area.

The fact that 14 of the team members are no longer in the Craig District indicates a transient staff. It appears that individual dedication and strength had more to do with resolution of the resource conflicts than factual information about the resources in the area.

154-33

This document, whether it was intended or not, makes statements about the commodity users i.e. livestock grazing which are damaging, misleading and appear to be unsupported. For example, Appendix 22, "...the stands still in existence are threatened by livestock grazing". However, nothing is said about threatened or possible damage by elk in Limestone Ridge

13.

154-33

even though it is a critical elk concentration area.

#### VIII. Summary

154-34

Based on the foregoing findings resulting from our review we feel the statement should be re-written as a draft document and submitted again to the public for review and comment.

154-35

Because of the time constraint we selected at random individual allotments to track management actions and conclusions through the document. The numerous errors, inconsistencies and misleading statements identified through application of a random selection process leads us to believe that there may be many more of these errors and inconsistencies. The Management Priority Areas concept caused us concern so we evaluated it in depth and have concluded that its intent was to identify management areas of concern, instead of establishing resource priorities. We reached this conclusion after review of the Kremmling and Piceance RMP/EIS's in Colorado and two other documents from other states.

154-36

The concept appears to have merit, if it is applied by a well trained interdisciplinary team utilizing factual data and is familiar with the geographic area.

The concept has been applied in the three resource areas of the Craig District with widely varying results. Its use in the Little Snake Resource Area appears to be significantly different as you have mixed management programs and goals with resource uses.

154-37

In addition you have not shown land ownership on the Management Priority Area maps which leads the public to believe that the Management Priorities apply to the entire area even though you have stated throughout the document that it applied only to lands administered by BLM. It is recommended that a land status map similar to the one used in the Kremmling RMP/EIS be considered. In addition we recommend that the Management Priority Area maps be restricted to Federally owned lands. After all, 53% is privately owned and 71% is administered by the State of Colorado. Because about 56% of the private and state lands are underlain by federally owned minerals, doesn't necessarily give you greater management control. Congress has recognized surface owner rights over the years, the latest being the Surface Mining Control and Reclamation Act of August 3, 1977. Without the consent of a qualified surface owner stripable mineral reserves are worthless.

154-38

We recommend that the Management Priority Areas concept be discontinued until it has been evaluated and more stringent guidelines are developed.

14.

For the reasons stated under the land use designations category concerning Federal Mineral Constraint Areas, we recommend that their use be discontinued and eliminated from the subsequent document. It is our opinion that you are jeopardizing private property rights over which BLM does not have jurisdiction. Some of the conclusions reached are superficial because you have not considered in-depth the consequences of their effects on the adjoining land owners.

NORTHWEST COLORADO RANCHERS ASSOC.

*Dean Visintainer*  
Dean Visintainer, President

15.

NORTHWEST TERRAIN TAMERS  
P.O. Box 1341  
Craig, Colorado - 81626-

May 8, 1956

Dear Sirs,

155-1 The NORTHWEST TERRAIN TAMERS 4x4 Club agree with the BLM about making the Diamond Breaks and Cross Mountain as wilderness areas. We feel that Limestone Ridge should be considered as a possible wilderness area. In the Vermillion Creek area, being a limited use area, we see no major problems due to its rough terrain and fragile soils condition.

155-2 As far as the Sand Wash area, we would like to see as much of this area as possible kept open to off road vehicle use. In any of the areas that are limited to no off road vehicles there need to be signs indicating that area's limitations.

One area that we think needs to be posted is the hill on the east side of Highway 315, just before the Sand Wash Basin turn off, where motorcycles and other vehicles leave noticeable trails on the hills, these hills are an eye-sore to the rest of the general public.

155-3 If the NORTHWEST TERRAIN TAMERS can be of any help in posting signs or any preventive maintenance on the land to help keep these areas open, we would like the BLM to contact us. We would gladly help out in any way. If the area needs to be adopted by the Club to help maintain it, we would consider doing so.

Thank You,  
NORTHWEST TERRAIN TAMERS CLUB  
*Forrest Williams, President*  
*Mike* Sec  
*Don Williams* 70000

I've been to Mt. Cross or Cross Mtn and camped their for several days. Staring at the burning campfire, I couldn't believe the feeling and inspirations that overwelmed me. It was like a higher power commanding me to tell people of the beauty and solitude that allows us to refresh our spirit and live in peace, not killing, coveting, stealing, bearing false witness etc. The riches of the natural environment are God like and should not be used in vain. Anyone can see that glorious country from the heights of Mount Cross and feel the refreshment of the spirit. But coming off the Mountain you also see and feel the greed. The false worship of black gold and minerals. The seeking of economic gain at any costs. Black gold to produce the wealth to make the trinkets and garbage we clutter our walls and yards and country sides with. Working day after day to get ahead we rape our lands because we say we need energy or is it because we need energy or is it because we need trinkets. We need to explore for energy for future generations or is it for garbage to clutter or yards. If we are concerned about future generations it should be to teach them to conserve and not worship trinkets. We should teach them the value of our environment and that it must be preserved, for it is our paradise.

Unfortunately we are slowly banishing ourselves from this land.

Leave Cross Mtn alone, wilderness

Moses Jochabed  
tribe of Craig  
born and raised  
on the river banks  
of the Yampa

(This letter was typed for reader clarity)

I've been to Mt. Cross  
or Cross Mtn and camped  
there for several days. Staring  
at the burning campfire,  
I couldn't believe the feeling  
and inspirations that overwelmed  
me. It was like a higher power  
commanding me to tell  
people of the beauty and  
solitude that allows us  
to refresh our spirit and  
live in peace, not killing,  
coveting, stealing, bearing  
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black gold and minerals.  
The seeking of economic  
gain at any cost. Black  
gold to produce the wealth  
to make the trinkets and  
garbage we clutter our  
walls and yards and  
country sides with. Working  
day after day to get ahead  
we rape our lands because  
we say we need energy or  
is it because we need trinkets.  
We need to explore for energy  
for future generations or is it  
for garbage to clutter or yards.  
If we are concerned about  
future generations it should  
be to teach them to  
conserve and not worship  
trinkets. We should teach  
them the value of our



156  
 environment and that it  
 must be preserved for it  
 is our paradise.  
 Unfortunately the area  
 is slowly becoming  
 unusable. I from that  
 along, save Cross Mtn  
 alone, wilderness

Moses  
 Tohabe  
 tube of Craig  
 Ben and visit  
 on the river banks  
 of the Gorge.



157  
**The Routt-Moffat Woolgrowers Association**

P.O. Box 1437  
 Craig, Colorado 81626

Northwestern Colorado - The Home of Choice Mountain-Raised Milk-Lamb

May 3, 1986

Rev. Jackson, Manager  
 Little Snake River District  
 1280 Industrial Ave.  
 Craig, CO 81626

Dear Roy,

The members of the Routt-Moffat Woolgrowers Assn. would like to go on record stating that we support every comment made in the document prepared by the Northwest Colorado Ranchers Assn. with regards to the Draft Little Snake Resource Management Plan and Environmental Impact Statement. To restate all of the issues of concern would be needless redundancy so, specific issues will not be addressed.

To summarize the comments made by the Routt-Moffat Woolgrowers Assn., it should first be stated that the RMP/EIS could have been better prepared had there been more input from the permittees so that many of the current inconsistencies, errors and biases could have been avoided. The general consensus reached by the body of the RMP/EIS was that with all the aforementioned problems, the Draft RMP/EIS should be re-done with clearer goals in mind and more, down-to-earth, input from a wider scope of people should be used. We all felt that the intended purpose of the RMP/EIS was a good one, but a document that would have such far ranging impact should be better prepared.

Thank you for the opportunity to comment and we hope that you take some of these comments to heart.

Sincerely,

*Steve Kitoroulas*  
 Steve Kitoroulas  
 President

FBI LAMB-WEAR WOOD



158

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION VIII  
 ONE DENVER PLACE - 999 18TH STREET - SUITE 1300  
 DENVER, COLORADO 80202-2413

MAY 4 1986

Ref: 8PK-EA

William J. Pulford, District Manager  
 Bureau of Land Management  
 Craig District Office  
 455 Emerson Street  
 Craig, Colorado 81625

Re: Little Snake Draft Resource  
 Management Plan/Environmental  
 Impact Statement (RMP/EIS),  
 Wilderness Technical Supplement

Dear Mr. Pulford:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VIII Office of the Environmental Protection Agency (EPA) has reviewed the referenced documents. We appreciate the opportunity to meet with Carol MacDonald and others of your staff in October 1984 to discuss several EPA concerns. We also submitted scoping comments for the RMP/EIS.

We have rated the draft RMP/EIS as F0-2 (environmental objections-insufficient information). This rating reflects our primary concerns for protection and attainment of water quality standards and associated beneficial uses, wetland-riparian area management, protection of ground water, minerals management, and monitoring. Water quality-related values are to be considered in future planning; however, we had difficulty in determining that potential impacts to surface water quality standards (designated beneficial uses, both numeric and narrative criteria to protect these uses, and the anti-degradation requirements), were consistent with RMP goals to protect and improve water quality.

The draft RMP/EIS documents contain several commendable components such as:

- o recognition of areas of deteriorated resource conditions,
- o recognition of soil and water quality improvement objectives,
- o identification of areas needing stringent watershed/water resource measures,

- o plans for riparian improvement, watershed management, and salinity control,
- o and an initiative to inventory ground water quality.

Our enclosed comments are intended to constructively contribute to the RMP by covering a range of concerns and recommendations regarding water, wetland-riparian area, watershed, and air resources.

The EPA would appreciate the opportunity to review and discuss with BLM the proposed responses prior to the proposed plan and final EIS. We are confident that such a coordination process would be very beneficial in helping resolve our concerns. Please contact Doug Lofstedt of my staff as needed for further EPA coordination (FTS 564-1717 or 303-293-1717).

Sincerely,

*Dale Vodehnal*  
 Dale Vodehnal, Chief  
 Environmental Assessment Branch

Enclosure

cc: Roy Jackson, Little Snake Resource Area Manager  
 Kannon Richards, Colorado BLM State Director  
 Rick Krueger, USFS, Grand Junction  
 Gary Broetzman, Director, Colorado Water Quality Control Division  
 Laurie Mathews, Colorado Department of Natural Resources  
 William Dickerson, A-104 (DFA, H.O.)

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Water Quality, Watershed, Aquatic Life

The RMP is to "develop management practices to protect and maintain existing water quality and quantity", and "identify methods to improve the quality of waters not meeting legal requirements" (page 1-7). EPA supports these activities since they are consistent with state and federal water quality standards (WQS). However, EPA has concerns about whether these objectives were consistently met in the RMP/EIS.

- 158-1 The following are several RMP/EIS statements which raise concerns about BLM's program for assuring compliance with WQS (refer to Section 313 of the Clean Water Act (CWA) for federal agency guidance for compliance with "Federal", State, Interstate, and local requirements" for water quality). BLM states that "Special stipulations . . . could be placed on federally controlled exploration and development activities within new lease areas in order to prevent: (1) significant increases in sediment yield and salt loading . . . and (2) contamination of both surface and ground water" (page 2-6). "Special stipulations could be added to new federal coal leases to protect or mitigate impacts to . . . water quality" (page 2-6). "The Upper Yampa River water quality is expected to be adversely affected, during low flow, over the long-term" (page 2-75). "Water quality management efforts should focus on preventing significant deterioration in the resource area's water quality" (page 3-63). "Degradation of water quality could result from vegetation removal and subsequent siltation, as well as inadequate or damaged reserve pits" (page 4-24). Possible disturbance from coal activities would increase "total dissolved solids (salinity) and sulfate concentrations", and could also increase "concentrations of other parameters such as hardness, lead, manganese, and copper in local surface water" (page 4-38). "Outside of heavily restricted areas, oil and gas development might have 'some degradation of surface water quality' (page 4-39). Other types of mineral development would result in water quality being 'adversely affected by increased sediment loads' (page 4-39). Improvements in water quality would occur only in 'some degrading areas' (page 4-41). "Water quality would be adversely affected by timber yarding", and "Road construction would be a greater cause of increased sediment loads in streams than logging" (page 4-41). Uses of water resources for various uses would be greatly limited because of degradation of (page 4-81). "Under all alternatives, the continuation of livestock grazing within the WSAs could adversely impact surface water resources", and "Maximum negative impacts to water resources are expected to occur under the Preferred alternative" (Wilderness Supplement page 4-11). "Increases in salt loading and other pollution of local and regional surface waters would represent an irretrievable loss of water utility" (page 4-84). These statements indicate a need to provide more direct consistency with State WQS regulations (both numeric and narrative criteria, including beneficial uses and antidegradation) to demonstrate that the standards will not be violated.

- 158-6 The CDRP requires National Resource Waters to have "perennial or continuous flow and be of high quality and capable of supporting trout fisheries." In the discussion of ONRWs in the 40 CFR Part 131 Preamble and in 40 CFR 131.12(a)(3), ONRWs need not have "perennial flow" or be "capable of supporting trout fisheries", nor even be of "high quality". Waters of ecological significance also fit the criteria for ONRW. Under Colorado law, the "High Quality Waters-Class 1" designation is essentially equivalent to the federal ONRW classification (with respect to the level of protection received). We would like to see the discussion of Criterion 18 revised to reflect these concerns for consistency of agency responsibilities, ONRW criteria, and designations.
- 158-7 Coal Unsuitability Criterion 19 (Alluvial Valley Floors) requires that "when mining Federal land outside an alluvial valley floor would materially damage the quantity or quality of surface or underground water systems that would supply alluvial valley floors, the land shall be considered unsuitable" (page A2-22). We were not able to determine that this requirement was addressed in the RMP.
- 158-8 Table 3-11 lists wildlife species of "primary interest in planning environmental issues. Additional aquatic life and fish species should be included (not just gamefish) in order to be consistent with CWA Section 101(a)(2) to "provide for the protection and propagation of fish, shellfish, and wildlife". Additionally, we request that cumulative impacts on fish/aquatic habitat be addressed on page 4-29.
- 158-9 The Federal Land Policy and Management Act (FLPMA) requirement that mining activities be regulated "to prevent unnecessary and undue degradation of the land" needs to be defined in relation to meeting water quality standards and antidegradation requirements.
- 158-10 The RMP/EIS needs to address the impacts of livestock on focal coliform levels in surface waters (page 4-39).
- 158-11 The RMP/EIS defers certain water quality assessments and the development of control strategies to later planning stages. Included are: studies of potential salinity control projects; plans for stabilizing high erosion areas; and studies of "saline and sulfate problems" in coal mine areas (page 2-66). The RMP needs to clearly identify the procedures/criteria that will be used in determining when a soil stabilization plan is needed, and for ensuring consistency with requirements of the CWA and the Colorado River Basin Salinity Control Act. What is the schedule for doing the four watershed plans (page 4-28) and the salinity control assessments? Additionally, what guidelines will be used in determining which surface-disturbing activities will have "heavy restrictions" to avoid increases in sediment and salinity in local streams (page 4-41)?

- The water quality standards regulations require, in part, that existing uses be fully maintained and protected, and that high quality waters be maintained (except in certain cases when certain specific requirements are met). In other words, not only should water quality be improved to meet standards where necessary, but high quality waters and existing beneficial uses must also be maintained and protected. This is also supported by both EPA's antidegradation policy (40 CFR Part 131.12), and the State's antidegradation policy (Section 3.1.8 of "Basic Standards and Methodologies", Colorado Water Quality Control Commission). The BLM should ensure that any potential increases in sediment, salt loading, or other pollutants that will adversely impact existing beneficial uses will be avoided.
- 158-1 The EPA questions how BLM could adequately identify methods to improve waters not meeting WQS without at least a summary evaluation and location of waters not meeting standards in the RMP/EIS. What are the water quality standards problems with those problem streams mentioned on page 3-53? Is this information to be in the "water quality and quantity inventory" to be completed (page 5-7)? When is the inventory to be done?
- 158-2 The RMP/EIS cites the document, "Classifications and Numeric Standards for the Colorado River Basin." The RMP/EIS should also include the companion document, "Basic Standards and Methodologies," which includes the narrative standards and antidegradation requirements.
- 158-3 The actions discussed for surface and ground water maintenance/improvement on page A17-2 appear to be both important and reasonable. We recommend that they be part of the Preferred Alternative (not just in the Renewable Resource and Natural Environment alternatives).
- 158-4 The RMP/EIS states that "impacts on water quality should not be as severe on a regional basis" (page 4-38). The RMP/EIS needs to reflect that WQS apply at all points on a stream, and not just on an averaged "regional basis".
- 158-5 Even though Coal Unsuitability Criterion 15 deals with fish and wildlife habitat, it appears that the analysis and results deal only with terrestrial wildlife (pages A2-16 through 18).
- 158-6 Coal Unsuitability Criterion 18 addresses the efforts of the Colorado Department of Natural Resources (CDNR) in identifying National Resource Waters (page A2-27). In discussions with CDNR, we were unable to determine that CDNR has undertaken such an effort. The designation of Outstanding National Resource Waters (ONRWs) is an integral part of the WQS program (40 CFR Part 131). In Colorado, the Department of Health, through the Water Quality Control Division and the Water Quality Control Commission (WQCC), administers the WQS program. Once the WQCC (rather than the CDNR) designates an ONRW, appropriate updates in the water quality management plans are made (40 CFR 130.3).

- 158-12 Ground water issues have been identified in the document and were discussed rather extensively. We strongly support the intention to inventory ground water quality and aquifer properties (page 2-66). Such a step is important for managing ground water resources properly. However, there needs to be more quantifiable commitments at the RMP level, e.g., locations, monitoring methods, timeframe, monitoring parameters, etc., for the inventory. Intentions to assure conformance of site-specific activities with EPA's Ground Water Protection Strategy and State ground water regulations (currently being drafted) also need to be in the RMP/EIS.
- 158-13 The potential increase in ground water total dissolved solids as a result of coal mining is mentioned on page 4-38. The EIS needs to discuss the potential effects of salts and metals on area wells and other beneficial uses of ground water. Mitigative measures should be discussed where impacts are potentially significant. The draft RMP/EIS also states that ground water flow "would not be significant if proper reclamation procedures were followed" (page 4-39). The RMP should have stronger commitments to assure proper procedures.
- Due to the technical complexities involved in designing and implementing a monitoring program that adequately links watershed activities and water quality objectives (including antidegradation requirements and other narrative WQS such as for aquatic life, as well as numeric WQS), the RMP should be quite specific about BLM plans to conduct monitoring and evaluations to determine achievement of water quality objectives. We suggest that the following components of the comprehensive water quality monitoring strategy be addressed to the extent possible (preferably in a monitoring chapter) at this level of planning:
- o goals and objectives (including effects on endangered species in the Yampa River),
  - o types of surveys (long-term, intensive) or assessments (including habitat evaluations and bio-monitoring) to be used,
  - o parameters and frequency to be monitored and their suitability in achieving the monitoring goals and objectives,
  - o management and environmental indicators, e.g., aquatic habitat, sediment delivery, to be used in assessing impacts of past, ongoing, and proposed activities,
  - o use of activity monitoring in sensitive areas,
  - o monitoring responsibilities of BLM, mineral development lease/claim holders, and other state and federal agencies,
  - o mechanism for monitoring implementation,

- o determination of adequacy of best management practices,
  - o reporting requirements.
- 158-14 o position or person responsible for monitoring program data collection, analysis, reporting, etc.,
- o aquatic life objectives, monitoring methodology, and threshold levels for modification in management direction,
  - o the feedback loop to achieve timely modifications to activities in response to monitoring results.
- As part of rangeland monitoring, water resource monitoring "may be necessary to measure changes in water quantity and quality" (page A14-1). We believe that such monitoring needs to be an integral part of the comprehensive monitoring plan.

#### Floodplains, Wetlands, Riparian Areas

- 158-15 The summary table for impacts to "Wildlife Habitat" (pages 2-76 and 77) should be expanded to include impacts on wetlands, riparian areas, and aquatic life for all alternatives.
- Only a "3-mile section of Beaver Creek" out of about 50 acres of riparian systems surveyed thus far (out of about 3000 acres of riparian area in the resource area) is in good condition. A large majority of the systems have been informally determined to be in poor condition (page 3-44). We commend BLM for addressing management direction to improve riparian and associated resources. There is a specific commitment to complete the Little Snake River Riparian Habitat Management Plan in September 1986 (page 1-11). Given the life of the RMP (10-15 years), we suggest more commitments for improvement, including plans, location, timing, and acreage. Are there to be demonstration areas? We also request that the RMP include specific plans to conduct a certain number of riparian inventories by a certain date.
- 158-16 Specific standards and objectives for wetland-riparian area restoration and improvement should be described more thoroughly. For example, what does protection of "satisfactory condition" as a habitat goal mean (item 7-2.c. on page 1-7)? What are the RMP guidelines for: forage utilization rates; streambank protection; wetland protection/rehabilitation; and for preservation of over-hanging vegetation?
- It is not clear that the direction for livestock grazing under the Preferred Alternative (pages 2-62 and 64) incorporates needed grazing restrictions in riparian areas as identified under the Natural Environment Alternative (item 4 on page 2-53). Are appropriate restrictions to be done after additional study? Under the Preferred Alternative, water quality problems, associated with utilization of riparian areas, would be ameliorated
- 158-17

- by fencing of these areas, as necessary" (page 4-40). How will the need for fencing be determined during later planning stages (since Appendix A11 shows only division and boundary fences)?

The RMP is to identify "all . . . wetland . . . habitats" (Issue 2-2.a. on page 1-7). Yet the RMP/EIS also states that "No inventories or surveys have been conducted on wetlands . . . habitat to determine number of wildlife species, diversity, or habitat condition or trend" (page 3-44). Further identification of wetlands and conditions should be made (and/or the specific commitments for inventories scheduled in response to Issue 2-2.a.), along with how future actions will comply with Executive Order 11990 (Protection of Wetlands).

The RMP should describe the formal, pre-discharge coordination process with the Corps of Engineers (COE) in applying the Section 404 Dredge and Fill Permit program on projects that would affect streams and wetlands under COE jurisdiction. Such factors as: notification of projects to be done under nationwide (or state or regional) 404 permit; identification of projects needing an individual permit; and development of mutually agreeable mitigation requirements for individual projects should be part of the description. We recommend that the coordination process include notifying the COE of all projects that would discharge dredged or fill material into streams, lakes, or wetlands. The COE will then determine whether an individual permit is required.

158-20 The draft RMP/EIS states that Federal Mineral Constraint Areas (FMCAs) "may include important . . . aquatic/riparian" areas (page 2-5). We suggest stronger guidance for inclusion of such areas in FMCAs.

The RMP/EIS states that "Removal [of certain portions of aquifers in the coal mining area] could result in the destruction or depletion of existing wells and springs" (page 4-38). The EIS needs to assess the impacts of this action on wetlands and stream characteristics. The site-specific mitigation standards to be used in addressing these impacts, e.g., wetlands replacement on a functionally equivalent, acre-for-acre basis, need to be identified.

During BLM consultation with the U.S. Fish and Wildlife Service (USFWS), the USFWS requested a 1/2 mile buffer area be declared unsuitable for surface disturbance along each side of these riparian corridors and wetlands" (Criterion 9 on page A2-12 and Criterion 12 on pages A2-14 and 15). However, for each criterion, "BLM has defined the most important area under its jurisdiction and declared it unsuitable". The RMP should clarify how BLM determined which areas were "most important", and how the BLM determinations compare with USFWS recommendations.

158-22

The RMP/EIS (item 5 on page 2-66) should describe the specific steps that will be used to ensure compliance with Executive Order 11988 (Floodplain Management).

158-23

#### Minerals Management

- 158-24 The draft RMP/EIS relies extensively on no surface occupancy (NSO) requirements or "stringent performance standards" for oil and gas leasing to address important resource considerations. We feel that there should be criteria established in the RMP/EIS in order to determine whether a particular area should be leased at all in order to provide adequate protection of other resources. Also, according to page 4-9, a NSO requirement would be made if the "very stringent performance standards . . . could not be met". We question whether a NSO requirement can be invoked after leasing when it is determined that the standards could not be met. There needs to be more specific RMP direction/requirements for when and how watershed cumulative impact analysis will be made to assure, for example, that water quality beneficial uses will be fully protected. Direction for water resource, protection under existing leases should be addressed.
- 158-25 The RMP/EIS states that NSO stipulations "might apply from within 500 feet to 1/4 mile of the water source, depending upon the type of source, use of source, soil type, and slope steepness" (page 2-66). Specific guidelines are needed in the RMP defining how the boundaries of the NSO stipulation will be chosen in the future, based on the above factors.
- 158-26 Milk Creek, Powder Wash, and the Little Snake River have documented problems from sediments and/or other pollutants (page 3-52). We suggest that they also be included as "fragile soil and water areas" for oil and gas reviews (pages 2-64 and 65).
- 158-27
- Current management would provide sufficient coal to meet demand (page 2-74). However, the Preferred Alternative would provide nearly four times as much acreage for consideration for leasing (638,758 versus 172,000 acres) according to Table 2-35. Given the potential adverse impacts of coal mining identified in the EIS on surface and ground water and wildlife habitat, we suggest that the RMP provide direction to locate new mining where it would maximize inter-agency coal management efforts and the protection of other resource values.
- 158-28
- The RMP/EIS states that coal mining would be a gradual process and that estimates of disturbance at any one time by all alternatives "are not available" (page 4-22). The water quality impacts of continued coal development in the Danforth Hills and Williams Fork coal areas "cannot be precisely determined at this time" (pages 4-37 and 38). Several potential impacts are discussed generally. In this case, we request either a worst case analysis (40 CFR Part 1502.22) in the RMP/EIS, or specific commitments for site-specific and cumulative impact assessments for the NEPA compliance documentation prior to leasing decisions. Additionally, the RMP/EIS should begin to describe the thresholds to be applied to the coal development that will protect water quality standards (use protection criteria, beneficial uses, and anti-degradation), and the iterative process for assuring adequacy of best management practices for water quality. The commitments for project specific determination of threshold levels should be described.
- 158-29
- 158-30
- 158-31
- 158-32

#### Air Quality

Air quality and related subjects such as climate, atmospheric dispersion, and meteorology are addressed in general terms. It should be stated more clearly that the RMP/EIS is not adequate for specific air quality assessments and that site specific data should be used for impact analysis. Table 3-2 on page 3-2 of the draft RMP/EIS is only representative of Craig, Colorado. Significant atmospheric stability and mixing height differences may be monitored at different locations, elevations, and topography, even at relatively nearby sites. These qualifiers should be stated or values should be expressed as ranges within the text, omitting the table.

The resource area meets all of EPA's National Ambient Air Quality Standards. Prevention of Significant Deterioration (PSD) requirements apply to this area, and the baseline data for particulate matter and sulfur dioxide have been set. This allows an increase in the ambient levels of these two pollutants only to the increments specified in the PSD regulations.

Air quality in the RMP/EIS could be discussed in terms of policy related to the type of assessment and to pollutant, source, or location. Methods of assessment inform the reader of the detail and approach intended to be used, since no site or source specific data is presently available.

#### Vegetation Management

High sediment yields are "emanating from rangelands in unsatisfactory condition" in the resource area (page 4-39). Thirty-seven percent of the currently inventoried acreage is in unsatisfactory condition with 33 percent of the area uninventoried (page 3-42). We suggest additional discussion of existing conditions in terms of multiple rangeland ecosystem values and benefits. What is the definition of "satisfactory" and "unsatisfactory" condition regarding these values and benefits? Secondly, Tables 2-35 and 4-6 indicate only a four percent increase in high ecological seral condition. The RMP/EIS should describe how a four percent improvement is:

- o a "major impact on ecological seral stages over both the short and long term" as stated to result from improvement projects on page 4-14,
- o a "significant improvement in the ecological seral stages" (page 4-15),
- o or how the improvements will substantively benefit watershed, erosion control, and surface water beneficial uses.

We request additional documentation and revisions as necessary for a stronger linkage of rangeland problems to solutions under the RMP framework. Additionally, there should be more specific documentation in the final RMP/EIS that deteriorated rangeland ecosystem considerations were used in determining Category 1 allotments (page A7-1 and elsewhere).

158-35

158-36



161

4788 Ventura Lane  
Fort Collins CO 80525  
May 6, 1986

Bureau of Land Management  
Craig District Office  
455 Emerson St.  
Craig, CO 81625

Dear Sir or Madam:

Having visited the Little Snake area a number of times, I read the Little Snake Draft Resource Management Plan with great interest. I appreciate the careful evaluation and summary in the DRMP of 23 Special Concern plants and of a number of uncommon plant associations found within the area. I appreciate the Preferred Alternative's proposed SMA designation of four such sites, Limestone Ridge RNA and Lookout Mountain, Cross Mountain Canyon, and Irish Canyon ACECs. Four other sites, however, also contain very important botanical features, and should receive SMA designation: Ink Springs RNA, Horse Draw RNA, G-Gap RNA, and Hell's Canyon ACEC. Each of these sites was included as a SMA in one or more other Alternatives. Clearly, then, they have merit for such designation, and their formal designation will add only 1,525 acres to SMA-designated land. I note that Ink Springs is included within the Irish Canyon ACEC as described in the Preferred Alternative, but I believe that the special features of this site warrant its separate RNA designation. Please describe in the final RMP the individual fencing provisions that will protect each of these eight sites from grazing, ORVs, and other physical disturbance that could lead to their destruction.

161-1

Although it is disappointing, I realize that when significant pressure exists to develop subsurface resources such as coal, oil, gas, and minerals, it is difficult for a public agency to recognize and protect plants and plant associations. The draft RMP demonstrates careful preparation and awareness of the importance of these components of the natural environment, for which I compliment the preparation team. I deplore, however, the Preferred Alternative's obvious bowing to developmental pressures. I support not only formal protection for the plant sites mentioned above, but also greater measures to ensure the continued existence of the botanical diversity of the Little Snake area. This could be partly achieved by recommending wilderness designation for the eight WSAs. The draft RMP's Wilderness Supplement makes clear that each of these WSAs is worthy of wilderness designation. It is especially inconceivable that Cross Mountain is not recommended for designation.

161-2

Right-of-way corridors would minimize significantly the effect of development on the natural environment, and I ask that this provision be included in the final RMP. I also ask that

161-4

recreational ORVs be limited to existing roads and trails

162

May 7, 1986

TO THE BUREAU OF LAND MANAGEMENT;

DEAR LADIES AND GENTLEMEN,

Please be aware that I heartily disapprove of your recent recommendations for the Cross Mountain area's wilderness ~~area~~ study. This area is unique in terms of ecological diversity and provides some of the best wilderness kayaking in the United States.

Potential oil and gas resources for Cross Mnt. are certainly ~~not~~ a reason to ~~make~~ a wilderness designation for this area. Especially when little or no exploration for oil and gas is being ~~conducted~~ performed, due to low crude prices.

162-1

If you have ever felt truly challenged by the environment, or felt the gently flowing Yampai River beneath your boat - you would understand how much your recommendation saddens me.

Aren't we forgetting the "potential resource" of these areas for human development and personal growth? (not urban)

I am pleased with your recommendation for Diamond Breaks, but feel quite strongly that Cross Mnt should be included.

Sincerely,  
Haley House  
Civil Engineer  
~~XXXXXXXXXX~~

161

-2-

161-4 throughout the resource area, again to minimize their destruction of natural values and their disturbance (via noise and air pollution) of wildlife and of other users.

Thank you for considering these points.

Sincerely yours,

M. P. Steinkamp  
M. P. Steinkamp, Ph.D.



United States Department of the Interior

NATIONAL PARK SERVICE  
ROCKY MOUNTAIN REGIONAL OFFICE  
655 Parker Street  
P.O. Box 25287  
Denver, Colorado 80225

IN REPLY REFERENCE TO

L7617 (RMR-PP)

MAY 9 1986

Memorandum

To: District Manager, Craig District Office, Bureau of Land Management, Craig, Colorado  
From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region  
Subject: Review of Draft Little Snake Resource Management Plan, Environmental Impact Statement, and Wilderness Technical Supplement

This memorandum constitutes our comments on the draft Resource Management Plan (RMP), the draft Environmental Impact Statement (EIS), and the draft Wilderness Technical Supplement (WTS).

Units of the National Park System (NPS) and the Bureau of Land Management (BLM) often share common boundaries, and consequently share similar resources and have similar management concerns. In this instance, the Little Snake Resource Area is adjacent to Dinosaur National Monument. Therefore, most of our comments will relate to potential impacts on the monument should BLM's preferred management alternative be implemented.

#### VISUAL IMPACTS

A primary concern is the potential for adverse visual impacts. Many of the fine views from within the monument encompass BLM lands. Especially of concern are some of the management priority areas designated in the preferred alternative. Large areas immediately adjacent to the monument would be given priority for mineral and oil and gas development. Additional impacts, including the visual impacts of timber harvesting and road building, could occur even on BLM lands more distant from the monument (e.g. Cold Springs Mountain and Cross Mountain), areas readily visible from the monument and its access routes.

The preferred alternative recommends only the Diamond Mountain Breaks Wilderness Study Area (WSA) for wilderness consideration, while the natural environment alternative proposes consideration of all the WSAs. The WSAs adjacent to the monument and on Cross Mountain would help to protect visual resources of the monument, so we would prefer that those areas receive wilderness consideration or another appropriate natural area protective designation.

163-1

Another aspect of the visual integrity of the monument is air quality. The discussion of air quality under the Impact Analysis section of the Environmental Consequences chapter (pages 4-4 and 4-5 of the RMP) is incomplete. The preferred alternative calls for up to 111 million acres to be open for oil and gas leasing. Yet there is no discussion of the possible air quality impacts of oil and gas leasing on the nearby Class II monument or on the two nearby Forest Service Class I wilderness areas.

Our experience has been that oil and gas exploration and development can be a major source of air pollution. For example, there are individual oil wells operating near Theodore Roosevelt National Park in North Dakota which are major stationary sources of sulfur dioxide (over 250 tons per year). We are particularly concerned that such exploration and development would exceed the Clean Air Act established increments (concentrations beyond baseline) for sulfur dioxide and particulate matter for Class I and Class II areas. Also, sulfur dioxide is a precursor for sulfates, micron size particles which reduce visibility and which are themselves precursors to atmospheric deposition (wet or dry). We are further concerned about contributions to air pollution from oil and gas wells emitting nitrogen oxides and hydrogen sulfide.

If the sulfur content of the oil or gas is high, processing plants must be constructed in or near the oil and gas fields to reduce the sulfur content. Tank storage areas and perhaps even refineries could be located in or near the oil and gas fields. The EIS provides no detail on these additional potential sources for air pollution impacts on the monument or the wilderness areas.

We believe that the final documents should include a detailed discussion of these potential air quality impacts of oil and gas leasing on nearby Forest Service and monument lands, as well as appropriate mitigating measures.

#### WATER RESOURCES

We believe, in general, that the documents devote inadequate attention to the potential impacts on water resources of the monument. This is especially true where activities such as timber harvesting and road building would take place on nearby lands. Where increased sediment loads are projected for certain activities, the documents do not discuss the potential impacts of such loading in monument waters.

The documents recognize the value of the waterways for recreation (e.g. the discussion on page 3-32 of the UTS of the importance of the Yampa River through Cross Mountain Canyon). The RMP/EIS also mentions that the Yampa River from between the confluences of the Little Snake River and the Williams Fork is listed in the Nationwide Rivers Inventory (NRI). This section possesses outstanding scenic, recreational, geological, biological, and cultural values - which probably qualify it as a component of the National Wild and Scenic Rivers System. The proposed areas of critical environmental concern, the proposed special recreation management areas, and the proposed 1/2-mile buffer zone (unsuitable for mining) within the coal planning area on either side of the Yampa River should, if implemented, serve to retain the eligibility of the NRI segment of the Yampa River as a potential component of the National Wild and Scenic Rivers System.

#### RECREATION

In general, the rationale behind projected recreational uses in the various alternatives is appropriate and convincing. As mentioned above, the values of hunting in the Resource Area are obvious. In this regard, the discussion of recreation on page 64 of Chapter 3 (RMP/EIS) states that "No estimates of use are available (except for hunting) because of the large size of the area and lack of funding and manpower for recreation management." However, Appendix 19 contains an excellent summary of recreation visitor days, both current (1985) and projected, for eight other recreational activities besides hunting.

#### NATIONAL NATURAL LANDMARKS

The section of Chapter 3 (RMP/EIS) on geology should take into account the potential impacts the proposed action and other alternatives would have on National Natural Landmarks (NNLs). The sites listed below are located within the Little Snake Resource Area. One of the sites, Fortification Dike Natural Wall, is located on public lands for which BLM has administrative responsibility; the remaining 7 NNLs are found within the boundaries of Routt National Forest, under the jurisdiction of the Forest Service (FS). We suggest that coordinated efforts be considered between the BLM and the FS to jointly address these areas as part of their respective natural resource management responsibilities.

The proposed NNLs, listed by county, are as follows:

Moffat County - Fortification Dike Natural Wall	BLM/State/Private
Routt County - Buffalo Park Ribbon Forest	FS
- Hahns Peak	FS/Private
- Hole-In-Wall Canyon	FS
- Little Red Park	FS
- McAlpin Mountain	FS
- Ruddy Slide	FS
- Park Range (Mt. Zirkel - Flattop Mtn. Area)	FS

Although we noted (page A2-10 of the RMP/EIS) that unsuitability criteria for NNLs are described, further planning for the Little Snake Resource Area should take into account these proposed designations and avoid impacts that could adversely affect the significant ecological and/or geological features of these areas. Site-specific information and material on the NNL program may be obtained from Ms. Carol Madison (NMR-PL), National Park Service, Rocky Mountain Region, P.O. Box 75287, Denver, Colorado 80275, telephone 303-236-8720 or FTS 776-8720.

#### WILDERNESS

We believe the documents incorrectly draw conclusions on the significance of the USAs as potential additions to the National Wilderness Preservation System (NWPS) on the basis of documents prepared by the NPS for other purposes (see page 2-62 of the RMP/EIS). The fact that the USA lands along the northern border of the monument were not found to be appropriate for addition to the monument does not speak to their suitability or appropriateness as wilderness.

#### MINERAL RESOURCES

We are particularly concerned with some of the management priority areas designated in the preferred alternative. Large areas immediately adjacent to the monument are given priority for mineral, oil and gas development. As noted above, oil and gas development near the monument could impair air and water quality, and result in increased noise due to additional traffic. We suggest that such management priorities could also lead to conflicts with monument values in the areas of scenic vistas, wildlife, wilderness, recreation, and endangered species such as discussed elsewhere in these comments. On the other hand, in the Natural Environment Alternative, the mineral priority areas are replaced with wilderness priority designations. We believe the document should address the combined impacts, including aesthetic intrusions, at the monument due to the proposed developments. With both alternatives, we would prefer that BLM give priority to wildlife, wilderness or other natural values on the areas near and adjacent to the monument. If the final proposal continues to identify oil and gas priority areas near the monument, we would suggest the imposition of the stringent stipulations, including no surface occupancy, to minimize impacts to monument values and resource.

We would like to compliment the preparers on the graphics in the RMP/EIS. The "Energy and Minerals" map was especially useful for our analysis of the potential impacts on the monument due to mineral extraction.

#### WILDLIFE AND FISHERIES

We note that the preferred alternative recommends a reduction in big game populations in the Resource Area. Given the economic benefits associated with big game in northwest Colorado, we feel that the management proposals under some other alternatives (e.g. Natural Environment) would be wiser choices for the long-term economic stability of the area. The other alternatives more closely meet the population levels of big game species sought or recommended by the Colorado Division of Wildlife. Therefore, we suggest that greater emphasis be given to wildlife priority areas in the selection of a final proposal.

We further note that there is no delineation of Animal Unit Months (AUMs) reserved for wildlife, even though the preferred alternative indicates only minimal reductions in livestock AUMs. We feel that the document should identify those reserved for wildlife. Furthermore, the RMP/EIS identifies 37 percent of BLM lands as having unsatisfactory livestock forage conditions (page 3-42) with another 33 percent of the lands in an undetermined condition; only 30 percent of the lands are in satisfactory condition. Similar poor conditions are identified in riparian areas. Given these range conditions, we believe it is even more important to (1) identify AUMs maintained for wildlife and (2) reduce grazing by domestic livestock more substantially than indicated in the preferred alternative.

We concur with the statement on page 2-110 of the UTS that "... these USAs could be more effectively managed by BLM rather than transferring administration to the National Park Service." However, we disagree with the rationale behind the above statement: "... due to the hunting and grazing taking place in the Ant Hills, Chew Winter Camp, and Peterson Draw USAs, as well as the oil and gas leases and mining claims within the areas ...". We believe the rationale should focus on the ability of BLM to manage these areas in a manner compatible with NFS resources and values, as represented by Dinosaur National Monument.

We note that the Diamond Mountain Breaks USA is recommended for inclusion in the NWPS; we support this recommendation. Although we would have liked to see positive recommendations for the eight other USAs in the Little Snake Resource Area, we recognize that there are concerns that could make such designations unacceptable to BLM management. Nevertheless, we would prefer some sort of protective mechanism - such as Visual Resource Management Class I designation ("preserve the existing character of the landscape") - for all non-recommended USAs.

#### GENERAL

A wide range of alternatives is described and analyzed in these documents. From the point of view of the NPS, the natural environment alternative (except for its provisions for wild horses) is more acceptable than the BLM preferred alternative. Selection of the natural environmental alternative, at least in the western portion of the Resource Area, would result in management which is more compatible with protection of Dinosaur National Monument's resource and values.

However, we recognize the validity of BLM's multiple-use approach to resource management and we would like to acknowledge some positive examples of protective planning as demonstrated in the RMP/EIS.

1. The BLM has identified the proposed right-of-way corridors (nos. 18 and 19) near the monument as "unsuitable." Use of those corridors would have presented significant conflicts with monument values.
2. Appendix 22 contains an excellent summary of "Special Management Areas," which, if adequately protected, should constitute almost ideal preserves for the rare plant and animal species described in each.
3. The "Affected Environment" chapter is quite thorough.

As with any large planning document, there are some editing needs. While we recognize that the RMP is not intended to be activity-specific, it could be strengthened with more detailed identifications of the types and magnitudes of expected impacts. As to be expected, there are questions relating to logical processes. For example, on page 4-50 of the RMP/EIS is the statement: "Paleontological resources in the Calico Draw RNA would be protected by designation in the Energy and Minerals and Natural Environment alternatives. Under the other alternatives, this area would not be designated, so some damage to these resources could occur." This seems arbitrary; if the resources are worth protecting under two alternatives, then a rationale should be provided explaining why they should be subjected to damage in the other alternatives, including the preferred.

We are aware of the close working relationships members of your staff have had with the staff of Dinosaur National Monument. This will no doubt continue, and recognition of each agency's management needs in our respective planning documents will be a key element in future mutual cooperation. Thank you for the opportunity to review these documents.

*Richard A. Streit*  
Richard A. Streit

cc: Supt., Dinosaur NP  
EDM, Ms. Graesser  
AIR, Mr. Nauge, Mr. Lucke  
WASO-762, Bob Stewart



## Sierra Club

Southwest Regional Conservation Committee

Rt 1 Box 25A, McNeal, Arizona 85617 (602) 432-7340

"TO EXPLORE, ENJOY AND PRESERVE THE NATION'S FORESTS, WATERS, WILDLIFE AND WILDERNESS"

7 May 1986

Bill Pulford  
USDI-BLM  
455 Emerson Street  
Craig, Colorado 81625

Dear Mr. Pulford:

The following are the comments of the Southwest Regional Conservation Committee of the Sierra Club on the February 1986 Draft Little Snake Resource Management Plan and Environmental Impact Statement (Draft, hereafter).

The Southwest Regional Conservation Committee represents Sierra Club chapters from the four state area of Arizona, New Mexico, Colorado and Utah, and acts as a coordinating body on conservation issues within that region.

We are sorry to report that we find the Draft deficient in a number of ways. In respect to grazing issues, we find the Draft so inadequate as to be in violation of several laws, including the National Environmental Policy Act (NEPA) and the Federal Land Policy and Management Act (FLPMA), and we recommend that the Draft be completely reworked before a final Plan is issued. In particular, we find the Draft to be vague (sometimes to the point of utter vacuousness), incomplete, non-specific, often apparently deliberately misleading and, in general, lacking the data necessary if the public and the land managers are to make reasoned, meaningful decisions about the Plan and its consequences.

While asking the public to make decisions on the basis of grossly inadequate data, BLM admits that its own decisions have been and are similarly based on lack of information; the agency, in effect, asks the public to sanction the agency's ill-founded and ill-prepared actions: this is akin to simply telling the public, "Trust me." Such trust cannot be justified when the agency has already allowed the resource to become badly deteriorated and when the agency plans to do little or nothing about the problem.

Rather than planning to correct the problem, the Draft merely calls for more studies and business as usual, with a vague possibility of some improvement somewhere down the road. The agency began this Draft in 1983 and admits that it still has not even progressed far

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enough in its "studies" (or so the Draft alleges) to know the condition of its ranges. More studies are undoubtedly needed and we urge BLM to seek budget increases for research, but good management practices cannot wait for interminable studies and uncertain funding.

We strongly recommend that in order to protect the resource from further degradation the agency immediately begin reduction of live-stock grazing on range that is known to be in poor or fair condition.

The Draft says that Allotment Management Plans (AMPs) and Habitat Management Plans (HMPs) will be forthcoming, but it does not say when or where or how many or in what priority according to what criteria. We recommend that the agency immediately set dates by which AMPs will be in effect on all allotments, and that all be in effect before the year 2000; and that the agency clearly state in the Resource Management Plan (RMP) the criteria to be used in determining (a) in what order allotments will receive AMPs; (b) what stocking rates will be permitted according to specific quantifiable criteria; (c) what kinds of range treatments will be used based on what range conditions; and (d) what kinds and scheduling of monitoring will be followed to assess success or failure of the AMPs.

The Draft states that "the [agency] does not have the management emphasis and do not pr... acts or actions... in most... required to implement resource... detailed or site-specific studi... with the National Environmental Policy Act and its implementing regulations." In other words, the Draft says that BLM will only propose standards, objectives, criteria and more studies, but does not plan to actually implement corrective and protective measures. Nonetheless, grazing and its problems and management decisions in regard to them continue. The agency does not in fact propose to make no management decisions while it awaits more study results, but prefers to make only decisions that maintain the status quo, and the status quo is continued decline in range condition for most of the lands in the agency's care.

The Draft's preferred alternative in regard to grazing is not much different from the current management alternative. Grazing issues are addressed in the Draft only because the agency was compelled to include them by a court-ordered agreement resulting from a 1973 lawsuit filed by the Natural Resources Defense Council, and without specific planning objectives and timetables the public has good reason to suspect that budget constraints, agency reluctance and inertia, and the agency's past record on grazing will result in the problem continuing indefinitely. This is definitely not in

compliance with NEPA.

Many examples could be cited of the Draft's failure to present necessary data. For instance, in an appendix on Range Site Inventory Methodology, the agency admits that its stocking rates are based on an incomplete inventory of the area's soils and vegetation (that is, based on inadequate site capability and carrying capacity information) and does not include a description of the methodology by which "the normal expected potentials of each range site and the various stocking rates for each ecological serial stage" are to be determined. The appendix does not explain the inventory methodology, it merely says there is one and that by using it (which might be done someday) or by using some other method, the agency has or may determine ecological serial stages and livestock forage conditions.

Similarly, the Draft says that BLM has a "systematic monitoring" policy for "resource condition," but that policy is nowhere stated in the Draft and no results of such monitoring are presented. In fact, the section of the appendix quoted above indicates that if such a policy does exist, it is not being followed.

The Draft states that there are 381 grazing allotments in the resource area covering 97% of 3,258,000 federally-owned acres. Some 7% of the allotments, covering 37% of the allotted acres, are classified as being in unsatisfactory condition, while 31% of the allotments covering 73% of the acreage are in undetermined condition. No criteria are presented so the public can judge whether or not the BLM's classifications are accurate.

Again, based on what it admits is inadequate monitoring (apparently done according to policy), the agency says it has taken "the first step in ranking allotments according to their potential need for future improvements" and has classified 71 allotments, representing 5% of the resource area's total acreage, in the improvement category and those allotments have been identified as "livestock grazing and range management" priority areas, presumably targeted for treatments to improve forage. But since the criteria for ranking allotments has not been presented, the public has no opportunity to judge the agency's determinations.

The Draft says that "the [agency] does not have the management emphasis and do not pr... acts or actions... in most... required to implement resource... detailed or site-specific studi... with the National Environmental Policy Act and its implementing regulations." In other words, the Draft says that BLM will only propose standards, objectives, criteria and more studies, but does not plan to actually implement corrective and protective measures. Nonetheless, grazing and its problems and management decisions in regard to them continue. The agency does not in fact propose to make no management decisions while it awaits more study results, but prefers to make only decisions that maintain the status quo, and the status quo is continued decline in range condition for most of the lands in the agency's care.

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164-6 use would be authorized at present levels" and "present management would continue on 277,077 acres (278 allotments)." This is absurd, self-contradictory and contrary to law.

The only hint of mitigating actions contemplated by the agency is contained in the heavily-qualified statement that "in cases where some key forage plants have been critically overutilized, it might be necessary to temporarily suspend a certain portion of preference AUMs until further monitoring could establish the proper carrying capacity" (emphasis added). Such action does not seem likely.

The primary responsibility of BLM is not to produce cattle, but to manage the range resource so it will produce a sustained yield of natural resources in perpetuity, including those resources that cattle are permitted to use. When the resource is abused by permittees, the agency must restrict, suspend or revoke the permit. BLM does not need to wait for more studies to know that the current decline must be checked. While it waits for more studies and more funds to conduct them and to implement intensive management practices, the agency should institute emergency suspensions of grazing in the most-damaged areas and the suspensions should be kept in place not just until further monitoring is done, but until the range is restored to satisfactory or better condition.

164-7 Rather than checking deterioration by restricting and removing livestock use, the agency proposes to increase allowed use by 921 AUMs through range treatments on 68 allotments and through structural "improvements" on 69 allotments. The land treatments included are interseeding (7791 acres), burning (23,179 acres), burning and reseeding (20,690 acres), plowing and reseeding (11,463 acres), spraying herbicides (6,598 acres) and spraying plus reseeding (4,156 acres). Only five AUMs have been written and only two of these are in operation (the other three being in need of "revision"). Range conditions are unknown on more than 1,000,000 acres, monitoring is incomplete or otherwise inadequate to make adjustments in current stocking rates, yet the agency proposes to implement these treatments, solely on the recommendations of the permittees who use the land in such a manner that treatments are deemed to be necessary.

164-8 The Draft presents no description of these projects, no maps, no criteria for determining when, where or why they would be carried out, no criteria for determining which methods would be used under what conditions, no discussion of respective costs of the various treatments to the environment and to the taxpayer. There is no documentation presented to prove that treatments would meet the goals of management and, in fact, no management goals are stated. There is no comparative analysis to show that the treatments would be better than the cheaper methods of redistribution of livestock or cutting of livestock numbers.

The economic feasibility of BLM's whole grazing program is questionable, from the subsidies of low permit fees to the expenditures for monitoring, but the Draft presents no cost/benefit analyses to justify the allocation of 9% of the public land to livestock use. Instead, the agency says that such analyses will be included in AUMs to be developed later.

As with other aspects of the Draft, development of economic analyses is relegated to some vague point in the future and business is to go on as usual. This is not management, but lack of it. The place for cost/benefit analyses is in the RMP, along with clear descriptions of management objectives, criteria for choosing among alternative management methods and practices, implementation schedules, and all the other missing information noted in this letter. It is simply not acceptable for the agency to keep putting management off to the future while continuing to allow cattle to abuse the resource.

164-9 Part of the problem with the Draft is that it consistently seems to identify range management with livestock management. Wildlife, especially non-game wildlife, is badly neglected in the Draft, as it is in the field. No acreages are presented for comparison of livestock and wildlife priority areas. No figures comparable to grazing allotment figures are given to determine habitat condition, no habitat condition or type inventory is given or planned, criteria for judging wildlife habitat and population variables are absent, standards for triggering habitat improvement projects are missing, etc. etc. etc.

The Draft states that the Little Snake River Riparian HMP is scheduled for completion in September 1986 but no other HMPs seem to be underway, though the Draft says others will or should be proposed. But future planned or proposed documents cannot take the place of information that should be included in the RMP.

164-10 The Planning Issues and Criteria section of the Draft notes that the agency will "determine management objectives for terrestrial, riparian and aquatic habitats," but the Draft does not present any steps in achieving those objectives. The Draft does say that "wildlife habitat would be intensively managed or protected in wildlife priority areas" and goes on to name an unacceptably small number of such areas. But the Draft does not say what "intensively managed or protected" means, and the public is left to assume that management and protection must await development of the proposed HMPs which, like the proposed AUMs, are relegated to some indefinite future. Whatever actions the agency might take, it does not seem to be at all interested in non-game wildlife which, except for a few listed or otherwise special species, are not mentioned in the Draft.

164-11 One way to immediately improve habitat would be to allow more of the range to return to climax stage. The Draft calls for only 3% of the range to be in climax condition while 95% is to be maintained in what "high" or "medium" seral stages for the benefit of livestock. This is an unacceptably low percentage for climax vegetation and constitutes a conversion of rangeland types, a virtual destruction of animal and plant diversity comparable to the wiping out of old growth stands in the destruction of forests. In both cases the practice is carried out at least 10% of each allotment, to revert to and be maintained.

Perhaps the greatest inadequacy of the Draft is its complete omission of information on the proposed herbicidal treatments of range. The Draft does not indicate:

1. What kinds of chemicals might be used
2. What amounts of chemicals might be used
3. Under what economic and ecological conditions chemicals might be used
4. Where chemicals might be used
5. What the risks of chemical use might be
6. What the benefits of chemical use might be
7. What the costs of chemical use might be
8. What the methodology for monitoring effects and residues of chemical use might be
9. What the social concerns related to chemical use might be
10. etc.

Similar information is missing for other proposed land treatments, but the omission is particularly significant in the case of herbicide use because of the potentially high risks involved. The statement in the Draft that "chemical control is basically the same as prescribed burning, although forbs would require an extra two or three years to recover" is absurd in the first clause and belied by the second; and since it is not the result of misquote, it must be considered almost criminally misleading.

Pesticide use should be included in the RMP as a separate issue and be allocated its own appendix or appendices to display the various impacts and risks it entails. The implications of pesticide use should be addressed in the discussion of each management alternative and in each section of the environmental consequences portion of the RMP.

As with the other missing information in the Draft, pesticide use data should be supplied in the RMP and not just in later environmental assessments for particular projects. The public must be given the opportunity to see the overall pesticide use picture in the Little Snake Resource Area, and that is why we have area-wide plans and

164-12 environmental impact statements. Ten thousand acres of chemical application constitutes a significant action under Council of Environmental Quality guidelines, and therefore necessitates full disclosure, analysis and discussion in an EIS, not just cursory attention in scattered EAs.

In closing, however, I request that any future EAs for rangeland, livestock, wildlife or pesticide projects, as well as any future AUMs and HMPs, be sent to me for review before implementation.

Sincerely,

*Michael Gregory*  
Michael Gregory  
Rangeland Management Coordinator





STATE OF UTAH  
NATURAL RESOURCES  
Wildlife Resources

Northwestern Region - 157 East 102 North - Vernal, UT 84078-2110 - AC: 789-3103

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Norman H. Jorgensen, Governor  
Dea C. Jorgensen, Executive Director  
Wildlife - Game Division Director

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May 8, 1986

Mr. William J. Pulford  
District Manager  
Craig District Office  
Bureau of Land Management  
455 Emerson Street  
Craig, Colorado 81625

Dear Mr. Pulford:

The Utah Division of Wildlife Resources (UDWR) has reviewed the Draft Wilderness Technical Supplement to the Little Snake Resource Management Plan and Environmental Impact Statement.

Very little land administered by the Craig District of the BLM is geographically located in Utah. Our comments pertain only to those parcels of land which are in Utah. The UDWR has identified two WSA's which merit comment, they are: the West Cold Springs WSA and the Diamond Breaks WSA.

The West Cold Springs WSA. Rocky Mountain Bighorn Sheep were recently reintroduced into the Beaver Creek drainage of the WSA by a joint venture involving the Colorado Division of Wildlife (CDOW), the Utah Division of Wildlife Resources and the Bureau of Land Management. Sheep have historically inhabited this terrain. Their introduction into the WSA was predicated on their former existence there.

Telemetry locations and visual sightings of the sheep demonstrate significant habitat usage in the WSA, particularly the Utah portion.

Research has shown that sheep are dependent on grassland vegetative communities as a matter of dietary preference and necessity. The only effective, natural way to prevent sheep mortality by parasite problems is to provide nutritious food sources and subsequent good health and vigor in the animal.

Vegetative manipulation to create and maintain high quality grasslands for this herd of sheep is a matter of great importance, if the herd is to prosper.

The land classification of the West Cold Springs WSA should reflect that important need.

Mr. William J. Pulford  
May 8, 1986  
Page 2

Diamond Breaks WSA. The UDWR owns land and has lease options on parcels adjacent to the WSA boundary in Utah. These lands are part of the Brown's Park Waterfowl Management Area.

Vegetative manipulation and subsequent farming practices have created a critical fall, winter and spring range for mule deer immediately adjacent to the WSA boundary.

There is potential to develop more winter range in the same fashion on lands that are in the WSA.

The importance of this management option for big game herds in the area is critical.

165-1 Therefore the UDWR supports realigning the WSA boundary back towards the cliffs (south) in sections 10, 11, 14 and 15, T.1 N., R.25 E., S.1 B. & M. It appears to have been done on the "Proposed Suitable Boundary" designation on Map 2-4, page 2-25 of the document.

This minor change in the proposal would enable the needs of wildlife management to be met without affecting other aspects of the proposal.

The UDWR appreciates the opportunity to provide comment on this document.

Sincerely,

*Donald A. Smith*  
Donald A. Smith  
Regional Wildlife Supervisor

166

Ellen Eakins  
4801 N. 107th St.  
Lafayette, Co. POC26

William J. Pulford  
Craig District Manager, BLM  
455 Emerson Street, Craig, Co. 81625

Mr. Pulford,

I am disappointed with what the BLM has recommended for the Little Snake Resource Area in the Little Snake Draft Resource Plan. The report seems biased towards resource extraction, especially oil and gas, and grazing. I am very concerned about the Cross Mountain Area. The number of acres in the draft dealing with the monetary value of mineral resources in the area is unfounded and misleading. And yet, time was not given to the value of a Cross Mountain Wilderness Area.

166-1 I do not feel recommending administrative protection of Cross Mountain is enough. This leaves the fate of the area up to the discretion of individual administrators. The Area is much too valuable for that. Also, because of the poor history the BLM has in the management of Recreation Areas, I do not feel this is a good alternative for Cross Mountain. The area needs the permanent protection of Wilderness status.

An issue that needed to be addressed in this Draft Resource Plan, dealt with the Yampa River as a possible Wild and Scenic River. This was totally ignored. The Yampa, through Cross Mountain qualifies in every way for wild status, and, in planning future mineral development of the area, the impact on the river needs to be discussed. Even without the Wild and Scenic designation the impact on the river downstream through Dinosaur National Monument needs to be considered. This subject was not touched in the plan.

166-2 The only redeeming feature of the plan was its recommendation for the Diamond Breaks Wilderness, particularly the boundaries within Colorado. This is a magnificent area that will be a great asset to the U.S. Wilderness System. I lived in northwestern Colorado for several years, and Cross Mountain was one of my favorite places to be with nature. I am intrigued with that whole portion of the state, but Cross Mountain is a unique gem that should be preserved, as is, for future generations. Wilderness status is the only way to guarantee total preservation. I hope the BLM will admit its mistake and recommend Cross Mountain as a Wilderness Area. I can't stress this enough!

Sincerely,

*Ellen Eakins*  
Ellen Eakins



United States Department of the Interior  
OFFICE OF SURFACE MINING  
Reclamation and Enforcement  
BROOKS TOWERS  
1020 15TH STREET  
DENVER, COLORADO 80202

May 8, 1986

MEMORANDUM

TO: William J. Pulford, District Manager, Craig District Office; Bureau of Land Management

FROM: Neil Shilling, Mining Analysis Division, Western Technical Center

SUBJECT: Little Snake Resource Management Plan and Environmental Impact Statement (RMP/EIS)

We have reviewed the draft RMP/EIS for the Little Snake Resource Area and are submitting several comments and suggestions (attached) for your consideration.

We appreciate this opportunity to participate in the review of the document and look forward to seeing the final RMP/EIS. If you have any questions concerning these comments or any other matter relating to this RMP/EIS, please feel free to contact Floyd McMullen at (303) 844-2451.

Attachment

167

## Comments/suggestions:

- 167-1 Page 2-3, paragraphs 3 (oil and gas) and 10 (reality actions). Please expand your discussions to more specifically address oil and gas and reality conflicts with coal development. Your proposal to allow conflicts to be "settled by the operators" is unfair to a lease owner who obtained his/her rights in good faith, only to discover that conflicts with other users have not been settled. As a result of this confusion, the Colorado Mined Land Reclamation Division (MLRD) has in the past tried to require coal operators to compensate conflicting users for damages regardless of prior rights.
- 167-2 Page 2-3, paragraph 6 (wildlife habitat). Please expand this discussion to explain that critical habitats "can be mined" and that protection "may be implemented" depending on the extent and value of the specific habitat. The current discussion leads the reader to believe that all critical habitats would receive some protection. If not clarified, it could also lead the reader to a conclusion that because a specific habitat is determined to be critical, the area would not be mined.
- 167-3 Page 2-7, paragraphs 18 through 22. A title for what appears to be the discussion on the "wild horse" priority area should be included to eliminate confusion.
- 167-4 Pages 2-76 and 2-77 (wildlife habitat). We would suggest the addition of "wildlife habitat diversity" and "raptor nesting" as additional comparison factors for this resource. Highlighting the disturbance/reduction of both factors under the energy and minerals alternative would give the reader a better understanding of the alternative as a whole.
- 167-5 Page 3-33 (alluvial valley floors). If floodplains are present within the study area as indicated here and in appendix 2 (pages 42-18 and 42-19), some discussion of the area as prime farmland should be included. Alluvial valley floors, floodplains, and prime farmlands, are all considered to be "special categories of mining" under Colorado MRLD regulations and should be addressed in a uniform manner.
- 167-6 Page 4-21, paragraph 3 under wildlife habitat. The impact to breeding bird and mammal species who rely on aspen growth for population maintenance should be addressed.
- 167-7 Pages 4-22 through 4-24 (issue 1-1: coal). This section should be expanded to include impacts to raptors and other non-game species from the surface mining of coal. Routine impacts from stream diversions, changes in topographic diversity, and changes in vegetation diversity have dramatic effects on these species.

0498a

William J. Pulford  
Craig District Manager  
BLM  
455 Emerson Street,  
Craig, Co. 81625

Mr. Pulford:

I am writing to express my dissatisfaction, frustration and anger concerning the attitude shown by the Bureau of Land Management toward wilderness in the Little Snake Resource area. This has been evidenced by the entire BLM WSA process, demonstrated finally by the Little Snake Draft Resource Management Plan. I lived west of Craig for many years and spent a great deal of time exploring the country out there. I was appalled at the areas which were released from further wilderness study years ago: Limestone Ridge, Vermillion Creek, Irish Canyon and the Dinosaur adjacent units. I was relieved, however, that Diamond Breaks and Cross Mountain, the jewel of north-western Colorado, had been recommended for further study. Now I see that even Cross Mountain has been rejected. This is an outrage! This demonstrates how the entire process has been biased and onesided against wilderness. This needs correction.

Many pages of this draft were devoted to hypothesizing the monetary value of the oil and gas to be found under Cross Mountain. There is absolutely no solid evidence to support these figures. Further more, no consideration was given to the value of Cross Mountain as wilderness. I would suspect the long term advantages of keeping Cross Mountain wilderness would benefit more people, for more time than the few who would profit from the short term goals of destroying this unique and wonderful place. Also, to suggest that administrative controls can be counted on to afford any significant protection for Cross Mountain or any other area borders on the ludicrous, as does the idea of specially managed recreation areas instead of proper wilderness protection.

Another item which needs to be addressed is Wild and Scenic River status for the Yampa, both through Cross Mountain and any impacts on the river through Dinosaur National Monument. The lower Yampa River in general, and Cross Mountain in particular, represent very unique ecosystems with unmatched beauty. The Yampa meets all the requirements for Wild River status in Cross Mountain, and deserves study and protection.

- 168-3 As implied earlier, I have been distressed for some time about certain other areas which were undeservingly released from further wilderness study. Chief among these is Cold Springs Mountain, not just the western part, but the whole mountain, which includes the top, known to the studies as Limestone Ridge. I have spent many extended periods of time in these areas and can attest to their true wilderness character. The excuses given for non WSA status were lame and inaccurate. The divisions made because of so called roads, ways and stock runs had no factual basis and make little to no sense. The release of the Dinosaur adjacent unit was another irresponsible act, betraying the greater interest of the people of the United States. These areas are valuable additions to the monument and fit all the guidelines for wilderness designation.

It also seems that the recommendations concerning grazing is based on personal profit motives rather than a desire to protect the public lands. The fact that only part of the land was surveyed, with a disturbingly large percentage being in poor condition, proves something is not being done correctly.

The only partial redemption for this draft was the recommendation of Diamond Breaks for wilderness. It seems that the boundary lines (at least in the Colorado section) are excellent and someone should be commended.

In general though, it appears this draft was belligerent to the need for protection of the public lands and the protection of valuable wilderness areas. From the onset I couldn't believe the areas not getting proper wilderness study and protection: Limestone Ridge, Cold Springs Mountain, Vermillion Creek, the Dinosaur Adjacent areas, and many others. But to add Cross Mountain to this list is just amazing. There can be no other reason than personal greed and profit motives to destroy these areas. This sacrificing of land for profit can seldom be justified and never at the expense of the public and the loss of irreplaceable treasures. No money, no consumable resource can be so valuable that we should allow the destruction or spoiling of our few remaining wildernesses. The public lands are a trust for all Americans, for generations to come, not the short term profits of a few.

Sincerely,

*J. F. Ekins*  
John F. Ekins



Mr. William J. Pulford  
District Manager  
Bureau of Land Management  
Craig District Office  
455 Emerson Street  
Craig, Colorado 81625

Re: Little Snake Resource Management Plan and Environmental Impact Statement: Affect Upon Prospecting Permits C-19066, C-31244, C-33167, C-34126, C-35577, et. al.

Dear Mr. Pulford:

The draft RMP/EIS proposes to ban surface mining for other minerals within certain management priority areas. If approved in its current form, such a prohibition may affect some or all of the captioned prospecting permits as well as other permit applications currently pending before the BLM. Surface mining is the only economical method of extracting gold, rare earths, and other minerals found on the above permit lands. Were the BLM to ban surface mining for other minerals on any of the above permit lands, then the permit would, in essence, be worthless.

By letter dated April 24, 1986, I requested of the BLM that I be allowed to examine its factual findings and field studies in support of the BLM's conclusion that surface mining for other minerals presents irreconcilable conflicts with certain other uses that cannot be mitigated. I have never received a response to that request. A prohibition of surface mining within the above permit lands could cause severe economic damage and hardship to Centennial Gold Corporation as well as others. In the absence of thorough scientific studies substantiating the BLM's conclusions, the BLM may be liable for damages suffered by owners of prospecting permits issued prior to the approval of the RMP/EIS, if those permit owners are able to qualify for a lease but are prevented by the RMP/EIS from economic recovery of the minerals for which the permit was issued.

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Mr. William J. Pulford  
May 9, 1986  
Page Two

169-1 Please advise as to whether a stipulation prohibiting surface mining will be a part of any lease issued pursuant to the above prospecting permits or any other permit issued prior to the approval of the RMP/EIS. Centennial has already invested much time, energy, and money in obtaining the permits and conducting preliminary exploration. If Centennial will not be allowed to recover the minerals by surface mining techniques, which are the only economical method of recovery, then it must reassess its position relative to the permits and consider taking other appropriate action to limit and/or recover its losses.

Inasmuch as Centennial is now formulating its plans for the 1986 summer exploration season, a prompt response would be appreciated.

Very truly yours,

Garry L. Miller  
Administrative Manager

cc: Chief, Minerals Leasing Section  
BLM Colorado State Office

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## COLORADO NATIVE PLANT SOCIETY

P.O. BOX 200 • FORT COLLINS, COLORADO 80522



May 7, 1986

Mr. William J. Pulford, District Manager  
Bureau of Land Management  
Craig District Office  
455 Emerson Street  
Craig, CO 81625

Dear Mr. Pulford:

Re: Little Snake Draft Resource Management Plan

[This letter supplements the Colorado Native Plant Society's comments presented at the March 10, 1986, hearing in Denver CO.]

The Society commends the draft RMP's specific recognition of the presence, importance, and value of the many rare and special plant species and plant associations found within the Little Snake Area. We appreciate the fact that this Resource Area utilized trained, competent botanists to survey and inventory these botanical resources, and that measures for protection of some of the special plants are proposed. We agree with and strongly support designation as proposed in the Preferred Alternative for Limestone Ridge RNA, and for Irish Canyon, Lookout Mountain, and Cross Mountain Canyon ACECs. We urge, however, that four other botanically important sites be designated as Special Management Areas:

1. Ink Springs (280 acres) - recommended Research Natural Area (RNA)
2. O-Gap (275 acres) - recommended RNA
3. Horse Draw (690 acres) - recommended RNA
4. Hall's Canyon (280 acres) - recommended ACEC

The importance of each area is well-summarized in Appendix 22. Although administrative protective measures are proposed for these sites, we believe this to be an inadequate substitute for formal protection. SMA designation for these four sites would provide a significant improvement in the protective measures offered for plant resources, with only a trivial addition in land area to be protected (1,525 acres more). We also ask that these areas be closed to ORV use, which clearly is incompatible.

CONPS is disappointed that only the Diamond Breaks Wilderness Study Area is recommended in the Preferred Alternative as suitable for wilderness designation. Our Society and our members individually are concerned with conservation of all of our state's native flora, common species as well as rare. Although we recognize that wilderness designation may be accompanied by problems of overuse or other forms of abuse, we nonetheless support

170-1

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Little Snake draft RMP comments  
- page 2 -

170-1 wilderness for its many educational and recreational opportunities, including the pleasures our members, like many others, derive from quiet activities in natural settings. The RMP states, candidly, "Nondesignation of a wilderness study area would cause the loss of wilderness values in the long term because of short-term surface uses such as road construction, vegetation manipulation, surface mining, or construction of facilities..." (page 4-81). It seems inconceivable that we cannot set aside just 7% of the BLM lands within the Little Snake Resource Area, which the eight WSAs would represent, and prevent these losses to our future quality of life. The Colorado Native Plant Society therefore supports and urges the recommendation of all eight Wilderness Study Areas as suitable for designation. The exceptional biological, geological, anthropological, non-motorized recreational, and scenic values of Cross Mountain WSA, in particular, virtually mandate its designation as wilderness. The proposed Recreation Management Area clearly is inadequate for its protection.

170-2 Finally, we wish to comment that the Preferred Alternative does not fairly balance competing resource demands. "Potential" oil and gas development clearly is emphasized, at whatever cost to biological resources or other types of use. The "Natural Environment" alternative is ludicrous; it provides few significant differences from the resource development alternatives (Energy & Minerals, or Commodity Production), and it is therefore impossible to develop a Preferred Alternative that gives fair consideration to the environmental resources. Surely no one can believe that providing 124,000 grazing AUMs; over 1.10 million acres open to oil and gas leasing; 638,800 acres available for coal leasing consideration; and only 91,000 (of 2.4 million) acres withdrawn from mineral entry and development constitutes an Alternative that "... (emphasizes) the protection and enhancement of the natural environment," or "... (does) not detract from the natural setting" (page 5-2, Natural Environment Alternative description). Thus, we ask for re-formulation of a genuine "Natural Environment" alternative that would conserve the environmental resources to the same degree that the resource development alternatives would destroy them. Only then can a fair, rational Preferred Alternative be developed as a balance among several true alternatives.

Sincerely,

Susan S. Martin  
Susan S. Martin  
Conservation Committee Chair

171

7 Chardonney Court  
Grand Junction, CO 81503  
8 May 1986

William J. Pulford  
Craig District Manager  
The Bureau of Land Management  
455 Emerson  
Craig, Colorado 81625

Dear Mr. Pulford:

As a frequent recreational user of BLM lands in northwestern Colorado and thus being interested in their future management, I offer the following comments regarding the Little Snake Resource Management Plan.

I support BLM's recommendations with respect to Diamond Breaks, Irish Canyon, and Limestone Ridge. Irish Canyon, in particular, is a favorite area of mine—a great place for photography, "geologizing," and studying rock art!

171-1

However, I urge you to change BLM's recommendations for Cross Mountain, West Cold Springs, and the five small WSAs adjacent to Dinosaur National Monument. Together they comprise relatively little acreage, less than three percent of the lands available for mineral development in the vicinity. Yet their obvious wilderness values are being sacrificed for their potential oil and gas values. This is not right! Surely the economic gains from mineral development cannot outweigh the importance of these areas with respect to wildlife habitat, scenic values, and opportunities for solitude and primitive recreation. These areas deserve the protection that only wilderness designation can afford.

Thank you for considering my comments.

Sincerely,

Diane L. Lengdon  
Diane L. Lengdon

1907 Monument Canyon Dr.  
Grand Junction, CO 81503  
May 8, 1986

Mr. William J. Pulford  
Craig District Manager  
Bureau of Land Management  
Craig, CO 81625

Dear Mr. Pulford:

I am writing to urge you to reconsider the proposed status of the Cross Mountain Wilderness Study Area as presently designated in the Little Snake Area Resource Management Plan.

172-1 Although I have never personally been in the Cross Mountain WSA, I have been in nearby areas in the canyons of the Green River and have seen photographs of this area and have read descriptions of it. From these sources of information I am convinced it should be classified as a designated wilderness area. In view of its status as habitat for certain endangered or threatened species of wildlife, I feel that such a classification is all the more justified.

I urge you to place Cross Mountain WSA in the category of designated wilderness in the interests of the greatest good over the long haul.

Respectfully,

*Joseph G. Hall*  
Joseph G. Hall

I protest the plan to restrict the use of motorcycles and all terrain vehicles in the Sand Wash Basin area west of Maybell, Colorado.

*William J. Pulford*  
P.O. Box 77428  
Steamboat Springs  
879-5758

4700 Venturi Lane  
Fort Collins CO 80525  
May 5, 1986

Mr. William J. Pulford  
BLM Craig District Office  
455 Emerson Street  
Craig CO 81625

Dear Mr. Pulford,

Thank you for the opportunity to comment on the Little Snake draft Resource Management Plan. Although I find the Preferred Alternative unsatisfactory in general, for reasons to be presented below, I do support its proposed designation of Limestone Ridge RNA and three ACECs (Lookout Mountain, Cross Mountain Canyon, and Irish Canyon). The draft RMP's excellent presentation of the rare and special concern plant resources of the Resource Area gives ample justification for these Special Management Areas; in addition, I urge that Ink Springs be designated an RNA (as opposed to the proposed inclusion in the Irish Springs ACEC), and that G-Gap and Horse Draw sites also be designated RNAs. I am deeply concerned that Colorado not sacrifice good quality examples of uncommon plant associations, which these sites represent. Together these three sites total only 1,245 acres, which surely can be set aside with formal designation to protect the botanical values. I also urge ACEC designation for the 280 acre Hell's Canyon site to provide better protection for its rare plants.

To evaluate the draft RMP, I examined the Preferred Alternative (PA) for each of the 19 "issues" listed, and compiled a table summarizing which other Alternative it most closely followed (see Table 1, page 2 of this letter). Several interesting points can be seen in the table:

- 174-1
- (1) all "issues" pertaining to developing resources closely followed Commodity Production and/or Energy & Minerals alternatives.
  - (2) the Wilderness "Issue" in the Preferred Alternative was directly (exactly) taken from the Energy & Minerals alternative; does this suggest a balance or compromise among alternatives?
  - (3) the Natural History "Issue" in the Preferred Alternative proposes fewer RNAs (1) than even the Energy & Minerals (4) or Commodity Production alternatives (3); does this suggest a balance among alternatives?
  - (4) on the Major Rights-of-way "Issue," the Preferred Alternative's acres identified as sensitive to routing are even fewer than in Energy and Minerals alternative; does this suggest an adequate consideration of other resources?
  - (5) the Preferred Alternative's stance on the Threatened/Endangered, Candidate, & Sensitive Plant "Issue" is nearly identical to that of the Energy & Minerals alternative (1 RNA + 3 ACECs); does this provide a balance between resource development and resource conservation?

page 2

Table 1. Summary of the Alternative most closely resembling the Preferred Alternative's provision for each of 19 "issues" identified in the Little Snake draft RMP.

Issue	Alternative most nearly resembled by PA <sup>1</sup>				
	EM	CP	RR	CM	NE
Coal		XXXXXXX			
Oil & gas		XX			
Other mineral development		XX			
Livestock grazing		XX	XX		
Wildlife habitat				XX	
T/E, Candidate & Sensitive Plants		XX			
Wild horses				XX	
Soil & water resources		XX (with a few additions; all alternatives similar)			
174-1 Forest lands & woodlands		XXXXXXX			
Fire management		(All alternatives the same)			
Wilderness		XX			
Natural history		[Different from (worse than) any; fewer RNAs (1) than even EM (4) or CP (3)]			
Recreation		(Different from any)			
ORV designation		XX			
Cultural resources		(All alternatives the same)			
Paleontological resources			XX		
Acquisition/disposal areas		(All alternatives the same)			
Major Rights-of-way		less than XX			
Access, boundary marking, roads		XX			

<sup>1</sup>EM = Energy & Minerals Alternative  
CP = Commodity Production "  
RR = Renewable Resource "  
CM = Current Management "  
NE = Natural Environment "

This obvious bias in the Preferred Alternative is astounding when it is realized that the so-called "Natural Environment" alternative is hardly an alternative at all. The Natural Environment alternative is described (page 5-2) as providing "...the protection and enhancement of the natural environment and resources of substantial scientific interest. It would favor management and use that do not detract from the natural setting." By comparing the Natural Environment alternative (NE) with the alternative most destructive of natural resources, the Energy & Minerals alternative (EM), one quickly sees just how little different NE really is. For example:

Issue	EM	NE
Oil & gas		
open to leasing (million acres)	1.10	1.00
w/ standard lease terms		
open w/ seasonal restrictions (critical wildlife habitat)	685,927 ac.	SAME
open w/ avoidance stipulations or NSO	55,970 ac.	100,555
closed to leasing (proposed wilderness)	35,380 ac.	90,887
Livestock grazing	152,000 AUMs	124,000
T/E, Candidate, and BLM Sensitive Plants: acres designated as RNAs or ACECs	19,380 ac.	21,975
Wilderness		
WSAs recommended for designation (acres)	1 (35,380)	8 (90,887)
ORV designation		
Acres open	982,490	835,308
Acres limited (designated roads & trails)	262,000	343,160
Acres closed	55,510	122,172

It is clear that virtually the only difference between the extreme Energy & Minerals alternative and the misnamed Natural Environment alternative is the number of WSAs to be recommended for wilderness designation--8 in NE vs. 1 in EM. Proposing to set aside this difference of 55,507 acres, representing 4.3% of the 1.3 million acres in the planning area, apparently is what constitutes the Natural Environment alternative--which I submit should more correctly be named the "Only Slightly Less Development Alternative."

This analysis leads to the inescapable conclusion that the Preferred Alternative is based on faulty premises, in that the alternatives from which it is drawn are themselves faulty. If the Natural Environment alternative were formulated to do what its description claims, then it could be fairly valued against other alternatives in deriving a Preferred Alternative that truly balances protection of resources vs. demands for resource development vs. desires for recreational uses.

Having made many visits to the interesting and beautiful portion of Colorado that lies within the Little Snake Resource Area, I feel strongly about preserving some of that area. The "potential" for oil, gas, and minerals development should not cause us to lose sight of the inescapable fact that once destroyed, the natural values of this land can never return. Similarly, the archaeological values of the area are inadequately known, and once lost, can never be regained. I ask, therefore, that a new Natural Environment alternative be developed, and that a new Preferred Alternative be formulated in which biological, archaeological, and aesthetic resources are valued equally with the non-renewable resources. This clearly will lead to a revised Preferred Alternative in which, relative to the present Preferred Alternative:

- additional area is recommended as suitable for wilderness designation;
- SMA designation is proposed for additional areas having special botanical or geological features;
- a thorough inventory of archaeological sites is included;
- acreage identified as potentially available for consumptive use of non-renewable resources is significantly reduced;
- rights-of-way corridors are established to minimize effects of resource development on other, equally important, values;
- essential wildlife habitat is identified and protected;
- grazing is diminished to a level within the sustainable carrying capacity of the land, and eliminated where it is destructive to existing natural values;
- opportunities for non-motorized recreational activities are enhanced, and destructive motorized uses are limited.

Whether a non-renewable resource should be developed must be considered with consideration for all the other components of a multiple-use mix, not simply as a stand-alone question of whether it could be developed. The present Preferred Alternative does not allow that evaluation. The draft RMP is an excellent compilation of information on resources of the Little Snake Area, and the preparation team has made an enormous contribution to our knowledge and understanding of these resources. The final RMP, however, should not be based on the draft RMP's unsatisfactory, extremely resource development-oriented, Preferred Alternative.

Sincerely,

*Susan S. Martin*  
Susan S. Martin, Ph.D.

8 May 1986  
Audubon Society of Western Colorado  
2352 Broadway  
Grand Junction, Colorado 81503

William J. Pulford  
Craig District Manager  
The Bureau of Land Management  
455 Emerson  
Craig, Colorado 81625

Dear Mr. Pulford

Thank you for BLM's recommendation of Diamond Brecks as suitable for wilderness designation and for the identifications of Irish Canyon as an ACEC and Limestone Ridge as an RNA. We commend you for recognizing the uniqueness of these areas and the importance of their protection and preservation. We ask that you reconsider your recommendations for the remaining seven wilderness study areas within the Little Snake Resource Area, however, as we feel these areas possess wilderness values far in excess of their potential oil and gas and/or livestock values and deserve legislative protection to retain their character.

Cross Mountain is a distillation of wilderness--within its less than 14,100 acres, one finds unparalleled scenery, challenging recreation opportunities (hiking, whitewater kayaking, fishing, hunting), a unique assemblage of wildlife (bighorn sheep, mule deer, elk, and antelope, numerous raptors, and several species of endangered or threatened fish), and undisturbed cultural resources. Constituting less than one percent of the acreage available for oil and gas leasing in the vicinity, Cross Mountain's obvious wilderness values must take precedence over its ostensible mineral values.

West Cold Springs and the five small WSAs adjacent to Dinosaur National Monument have also been recommended as unsuitable for wilderness--again, apparently on the basis of potential mineral resources. West Cold Springs reflects a transition zone between physiographic provinces that is not well represented in the Wilderness System, provides habitat for bighorn sheep and elk, and offers outstanding opportunities for solitude

and primitive recreation within its numerous gorges. The five small areas abutting Dinosaur National Monument round out the topographical "boundary" of the Monument and should be considered together when assessing their contribution to the Monument as wilderness; their sacrifice solely on the basis of potential mineral resources is unjustifiable.

Lastly, we implore you to correct the detrimental grazing practices that have resulted in one-third of BLM's management area being in unsatisfactory condition. Further forage monitoring should be accompanied by immediate reductions in livestock allocations in areas known to be in unacceptable condition.

Thank you for considering these comments.

Sincerely,

*Danni L. Langdon*  
Danni L. Langdon  
Conservation Chair (Acting)

Dear Mr. Dufford:

In particular, a chapter to the deletion of the Cross Mountain WSA as a wilderness area. Protection from 4WD onslaught and development is very important for some remaining areas of the West.

Please consider designating this area as wilderness. I am a hunter, ~~and~~ a former Forest Service employee, and educated in Natural resources (BS forestry, Virginia Tech). I believe in wise resource use, and protection of some areas is part of that wise use.

Sincerely,

Kenneth L. Sevier  
PO box 770750  
St. Louis, MO 63177

1) 2000 10/10/00  
2) 2000 10/10/00  
3) 2000 10/10/00

William J Pulford  
Craig District Manager, BLM  
455 Emerson Street  
Craig, Colorado 81625

Dear Mr. Pulford;

We understand the ELM has not recommended Cross Mountain for wilderness designation.

This is unfortunate since there is considerable wildlife there and even some endangered species. I certainly hope their reasons for the denial are not due to speculative oil and gas availability.

Please send me a draft plan since I wish to urge you to support wilderness for Cross Mountain and not oil and gas exploration.

Sincerely yours,  
Kathy L Towner  
Kathy L Towner

klt,ss

W. a. p. 111.

I was waiting to discuss my concern about the possibility of a large section of the American National Archives being shipped to the British under a supposed policy existing late in 1944 or May 1945 and I had a brief moment of that thought, beautiful, magnificent. The scenery cliffs with beautiful blue mountains were marvelous, and now I find even how to mention the technological significance of 1944.

So now to understand this a large, long-hand  
dated, fully new History of the Mayan Empire  
from the 19th century to the 19th century  
revisions of the 19th century and it does not call  
to the imagination of the 19th century. The imagination  
is that the 19th century is the 19th century. The 19th  
century is of the 19th century to the 19th century. The  
19th century is the 19th century. The 19th century is  
the 19th century. The 19th century is the 19th century.

But recreation at noon is much more than  
sitting on the veranda. Ladies and company  
is the company as such is understood, they do  
more so as it is a single to every get  
there for recreation and study.

[illegible]

United States Senate  
WASHINGTON, DC 20510

May 13, 1986

Mr. Pulford, District Manager  
Craig District Office  
Bureau of Land Management  
U. S. Department of the Interior  
455 Emerson  
Craig, Colorado 81625

RE: Draft Little Snake Resource Management Plan and  
Environmental Impact Statement.

Dear Mr. Pulford:

The Northwest Colorado Ranchers Association has contacted my  
office, expressing concern over the Draft Resource Management Plan  
(RMP) and Environmental Impact Statement (EIS) for the Little Snake  
District.

170-1 The RMP appears to contemplate that the resource area is most  
appropriately managed for long term recreational and wildlife  
benefits. To that end, the Ranchers Association is concerned that  
historical wildlife usage as proposed in the plan will create  
conflicts with livestock usage. Similarly, the plan indicates that  
forage deterioration is attributed solely to livestock and none to  
wildlife. The Association also raises questions about the theory upon  
which recreational benefits were credited to the District. They were  
apparently predicated on analysis of dollars generated by recreational  
activities in Routt County as a whole, a comparison which may not be  
accurate.

In reviewing the comments that this plan generates, I ask that you  
do so with an eye toward balancing all the multiple use aspects in the  
District, including livestock, wildlife, mining and all other purposes  
which can be accommodated within the resource area.

Best regards,

Sincerely,  
  
William L. Armstrong

WLA:av

179

UNIVERSITY of COLORADO WILDERNESS STUDY GROUP

May 2, 1986

William C. Pulford  
Craig District Manager  
Bureau of Land Management  
455 Emerson Street  
Craig, CO. 81625

Dear Mr. Pulford,

Enclosed are the comments of the University of Colorado Wilderness  
Study Group on the Draft Little Snake Resource Management Plan and  
Environmental Impact Statement.

The University of Colorado Wilderness Study Group endorses the Natural  
Environment Alternative and the A-1 Wilderness Alternative. These  
alternatives provide the best protection of the resources such  
as wildlife, wilderness, cultural resources, and rare and unique plant  
species.

While the University of Colorado Wilderness Study Group appreciates  
the opportunity given by BLM for public comment, we are extremely con-  
cerned as to whether the Little Snake Resource Area is truly committed  
to a fair and fair consideration of public input in its land use plan-  
ning process.

The RMP/EIS as a whole is not a document we are particularly impressed  
with. Indeed, BLM analysis and conclusions are unfortunately shallow  
in most respects. We are particularly concerned for the Little Snake  
Resource Area.

The Wilderness Study Group hopes that the following comments can be  
helpful to BLM in upcoming resource management decisions. To begin with  
we would like to commend BLM for one thing, having recommended at least  
Diamond Breaks for wilderness. Unfortunately, BLM has ignored Cross Mt.,  
Gold Springs Mt., and the five other small Dinosaur Adjacent Areas, which  
all have equally outstanding wilderness values and deserve inclusion  
into the National Wilderness Preservation System.

180-1 The MSG would in particular like to recommend reconsideration of Cross  
Mt. WSA, Cold Springs WSA, and Vale of Tears. They contain some of the  
most spectacular and ecologically diverse country in Northwestern Color-  
ado.

180-2 How can BLM protect crucial habitat for the many threatened and endange-  
red species and other wildlife in the area without permanent legal pro-  
tection for these areas as wilderness, where administrative protections  
have been shown throughout history to be inadequate in protecting wild-  
erness values?



PEREGRINE  
FALCON

UNIVERSITY MEMORIAL CENTER BOULDER, COLORADO 80502 (303) 442-6870

U.S.G. Little Snake RMP Comments (continued)

180

While we are supportive of AEC, RNA designations for Irish Canyon  
and Limestone Ridge, we feel that in the cases of the other WSAs  
wilderness values need to be protected with wilderness designations.

180-3 Regarding high potential for oil and gas resources on WSAs, or as  
is the case with Cross Mt., moderate potential for oil and gas, this  
does not justify excluding the WSA from inclusion into the National  
Wilderness Preservation System. Some 1.8 million acres of federal  
oil and gas acreage exists in the vicinity, and designation of Cross  
Mt. as wilderness still allows considerable acreage for other purposes.

Wildlife, recreation, and natural features CANNOT easily be protect-  
ed WHILE allowing oil and gas development to occur, yet BLM states  
this can be done. We ask how? (S-5 Summary of Rational Technical  
Wilderness Supplement) How will this be done for West Cold Springs?

180-4 Regarding West Cold Springs, an area the MSG recently did fieldwork  
in, BLM's comment on naturalness is invalid. (S-2 Summary of Rational  
Technical Wilderness Supplement). BLM states rights and sounds are  
noticeable within portions of the WSA, yet under opportunities for  
solitude and unconfined recreation BLM states, "crows and canyons pro-  
vide opportunities for isolation," and "the rugged terrain provides ex-  
cellent opportunities for primitive recreation." Is one to assume then,  
that the area is not natural, because of these sights and sounds?

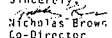
180-5 Concerning Vale of Tears, Deer Draw, Ant Hills, and Chew Winter Camp  
WSAs, MSG highly recommends these additions to Prosar National Mon-  
ument, and we find BLM rationale for excluding these WSAs shallow. BLM  
states these areas are not suitable because, "in and of themselves they  
do not possess outstanding wilderness values, yet, it is precisely be-  
cause when combined with BLM they create fantastic wilderness values!  
In addition they round out the topography and create important eco-  
system linkages. Does BLM consider this aspect?

180-6 A final note on the wilderness recommendations by BLM. On several WSAs,  
(S-7 Summary of Rational Technical Wilderness Supplement), BLM states,  
"while it would add to the distribution, it's contribution would be minor  
when considering other areas being recommended or administratively en-  
dorsed for wilderness designation." If only Diamond Breaks is being re-  
commended for wilderness how is it these other areas are a minor contribu-  
tion? NO OTHER WSAs HAVE BEEN RECOMMENDED!

180-7 In addition to the above comments MSG would like to recommend evaluation  
by BLM of the Little Tampa Canyon, for possible Wild and Scenic River,  
at the very least the canyon should be designated Outstanding Natural  
Area.

Please consider these comments in the public record, and we hope they  
offer BLM some insight into our concerns about the Little Snake RA.

Sincerely,

  
Nicholas Brown  
Co-Director

MICHAEL L. SERANG  
To District Manager

INTERIOR AND WILDERNESS AFFAIRS COMMITTEE

CONGRESSIONAL  
WILDERNESS AND PUBLIC LANDS

U.S. HOUSE OF REPRESENTATIVES  
WASHINGTON, D.C. 20515

OFFICE OF THE CLERK  
U.S. HOUSE OF REPRESENTATIVES  
WASHINGTON, D.C. 20515



Congress of the United States  
House of Representatives  
Washington, DC 20515

May 8, 1986

Mr. William Pulford  
District Manager  
Bureau of Land Management  
Craig District Office  
455 Emerson  
Craig, Colorado 81625

Dear Mr. Pulford:

My staff has reviewed the Draft RMP/EIS for the Little Snake  
Resource Management Area. I would appreciate it if you would include my  
comments in the official record of comments on the RMP/EIS.

Although in general I find the document to be an attempt to balance  
the various competing interests involved in public lands usage in  
Northwest Colorado, I do find a need for more complete recognition of  
the needs of the livestock industry in this part of Colorado.

181-1 For example, the socio-economic impact that would be visited upon  
the communities in Northwestern Colorado should the livestock industry  
be forced to discontinue or severely curtail usage of the public lands  
has not been evaluated adequately. Comparison of recreational benefits

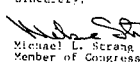
181-2 which may accrue to Moffat County with those in Steamboat Springs does  
not seem appropriate under the circumstances. Similarly, I find

181-3 instances in the document in which forage deterioration on the resource  
areas is attributed solely to livestock and not to wildlife. It seems to  
me the goal towards which Federal land managers should strive is proper  
management of both the livestock and of the wildlife using the forage.

The livestock industry is an extremely important part of Colorado's  
economy. I urge you to give careful consideration to the comments you  
receive from the livestock industry as well as from mining, oil and gas,  
recreation and other industries and interests.

With best wishes,

Sincerely,

  
Michael L. Serang  
Member of Congress


MLS:jh

5-15-86

Dear Kannon,

I want strongly to protect your immediate wilderness recommendations for 10% to 15% of Diamond Breaks and also to be greatly expanded. I want also strongly to protect existing 10% to 15% of the Snake River and Snake River. The Snake River and Snake River should be protected by all means for attention to this national center could be most appreciated.

Thank you



Lydia Garvey  
Box 40  
Rosedale, MD  
21270

# STATE OF COLORADO, DEPARTMENT OF NATURAL RESOURCES DEPARTMENT OF NATURAL RESOURCES

DAN O'NEILL, Executive Director  
1313 Sherman St., Room 218, Denver, Colorado 80203 966 3311



May 9, 1986

Mr. Kannon Richards, State Director  
US Bureau of Land Management  
1037 Twentieth Street  
Denver, Colorado 80205

Dear Kannon:

Thank you for the opportunity to review the Draft Little Snake Resource Management Plan and Environmental Impact Statement. We appreciate the open planning process followed by the Bureau in preparing this plan and your efforts to respond to sometimes difficult and competing demands. While several concerns remain about the plan, we have generally found the document well prepared and responsive to on-the-ground management needs.

Our specific comments follow.

## Wilderness

We concur with plan recommendations for wilderness designation of the 36,240 acre Diamond Breaks Wilderness Study Area. This highly scenic and wild area supports a great diversity of vegetation and wildlife and shares a common border with Dinosaur National Monument which enhances the recreational value of both areas. Diamond Breaks clearly warrants preservation as a national wilderness resource.

We would add our strong support for wilderness designation of Cross Mountain, an area not recommended for wilderness in the preferred alternative. Cross Mountain is a spectacular area of great diversity which provides outstanding kayaking, highly scenic vantage points, and which is visible to many motorists at the eastern entrance to Dinosaur. We understand there are concerns as to the future of royalty revenues derived from directional drilling and are willing to work with you and other interested parties to attempt to resolve this matter.

## Wildlife

The Colorado Division of Wildlife is greatly concerned that the preferred alternative represents a disproportionate reduction of wildlife habitat, to the benefit of grazing. In considering the preferred alternative, after range improvement projects are factored in, livestock ends up with a two percent cut from preference while wildlife cuts average over ten percent. The document should also discuss actual livestock use versus preference as there may only be sufficient production in most years to support actual use.

The livestock figures used in Table 2.35 do not reflect numbers discussed with the Bureau in the past and differ from those shown in Table 5.1. The difference between these tables and the need for each should be explained in the document.

The economic values displayed in Table 4.70 for deer, antelope and elk are substantially less than those used by the Division. Their basis should be discussed in the plan. The plan also needs to address future plans for monitoring and identify funding available for any intensive monitoring plan.

## Recreation

The plan presents a good discussion of the recreation resource. We particularly support the Resource Specific Guidance shown on page 2.17. This guidance emphasizes the provision of improved recreation information through map and brochure distribution and implementation of a sign plan, and provides a prioritized plan to acquire additional access to public lands. A discussion as to how these portions of the plan will be implemented should be contained in later chapters of the plan.

We are concerned that the plan will result in a shift of 297,000 acres of semiprimitive and primitive settings to rural and modern urban settings, and urge that as future development proposals are made for unprotected areas, the recreation resource play a strong role in management decisions. Appendix 19 does not reflect this rather dramatic change in available settings, but instead shows identical amounts of projected use for each of the plan alternatives. The assumptions and the Bureau's interpretation of the data need to be provided if the Appendix is to contribute new information to the document.

We support the use of no occupancy stipulations to protect highly valued recreational settings, particularly along the Yampa River. Permit stipulations for Cold Springs Mountain should be stringently applied to protect important recreation values.

Under the plan, 86 percent of the resource area is open to offroad vehicle use. The plan should provide a better picture of this demand and should tailor the area to be open accordingly, rather than allowing virtually unrestricted use and corresponding impacts throughout the entire area.

## Special Management Areas

We support the plan's recommendation to designate Irish Canyon and Lookout Mountain as Areas of Critical Environmental Concern (ACEC) and Limestone Ridge as a Research Natural Area (RNA). We recommend Ink Springs also receive Research Natural Area designation. This 280 acre area has the best conditions of any site in Colorado for a remnant Black Sagebrush community and includes significant populations of two BLM Sensitive Plant Species: *Penstemon yampaensis* and *Eriogonum tunulipsum*. Ink Springs RNA is a component of all other alternatives in the plan.

We support avoidance stipulations shown in the plan for plant associations situated in six areas: Vermillion Creek, Ace in the Hole, Horse Draw, G-Gap, Hell's Canyon, and Vermillion Bluffs. Stipulations should be extended to sensitive plant species on Horse Draw, G-Gap, and Hell's Canyon and shown on page 2-63 of the document.

The document should also state the specific management agreements we have reached with the Bureau for exemplary plant communities and sensitive plant species at Ace in the Hole Draw, G-Gap and Vermillion Creek Falls and to monitor special biologic features on all six of the sites.

*Cirsium oregoni*, a USFWS Category 2 species, has recently been found on Cross Mountain. Reference to *Owenby* thistle should be added to p. 3-40 (Threatened, Endangered, Candidate, and Colorado BLM Sensitive Plant Species). *Owenby* thistle occurs on steep, limestone canyon sides, on cliffs and crevices, and on talus among sagebrush and scattered junipers. The species is known from a few locations in Utah and Daguerre Counties, Utah and from Cross Mountain, Colorado.

## Coal

The principal effects of coal mining in the Resource Area will be related to hydrologic impacts. Mining operations should be sited so as to minimize impacts to surface and groundwater quantity and quality. Analyses of coal tracts for potential leasing must also consider the reclamation investment required in arid and semi-arid climates.

Prior to the leasing of any specific tracts the state will provide additional review through the Federal State Regional Coal Team process. Socioeconomic, fiscal and environmental impacts would be reviewed through local fiscal impact regulations and voluntary participation in the Colorado Joint Review Process. Analytical tools are available through the BLM supported Cumulative Impacts Task Force. Environmental issues would be subject to regulation by the Mined Land Reclamation Board.

## Oil and Gas

The Oil and Gas Conservation Commission supports the provisions and stipulations for oil and gas development in the plan. Restrictions in areas of critical wildlife habitat are typically for areas 10 to 80 acres



In size with the largest being 640 acres. The size and spacing of these areas appears compatible with future oil and gas operations. Special management areas with no surface occupancy restrictions are again sufficiently small in size as to remain compatible with development.

The plan recommends avoidance stipulations for the Irish Canyon and Lookout Mountain Areas of Critical Environmental Concern. One well has previously been drilled, plugged and abandoned in the Irish Canyon Area in Section 25, Township 10 North, Range 101 West in 1964 and three wells have been drilled, plugged and abandoned on the Lookout Mountain Area. These wells were in Sections 2, 7, and 9 of Township 10 North, Range 99 West and were drilled in 1960, 1982 and 1973 respectively. Based on this experience continued development in these locations appears likely but is expected to be accommodated under the provisions of the plan.

#### Water Resources

183-13 More information needs to be provided in the water resources section of Chapter 3 on water availability. Much of the water in the management area has already been appropriated under the state water rights system. While water is available in the mainstem of the Yampa, many tributary streams and groundwater aquifers are becoming overappropriated. Lists of those areas are available at the Division of Water Resources office in Steamboat Springs.

183-14 References to potential water development projects should also consider the implications of water availability. Where water projects are planned, water rights decrees should be obtained to protect the future use of water. If groundwater is to be used, a well permit is needed prior to the construction of the well. Some examples of references to water development projects in this document are: page 2-31, Livestock Grazing #5, page 2-55, Wild Horses #3, page 2-64, Livestock Grazing #5, page 2-66, Soils and Water Resources #3, etc.

183-15 References made on pages 3-31, 3-41 and 3-59 state that water ownership may not necessarily ensure the owner access to and use of a water source on public land. We wish to point out that Article XVI, Section 7 of the Colorado Constitution recognizes rights-of-way to water sources on public lands, upon payment of just compensation.

#### Transportation

The plan provides only a general discussion of transportation and access needs. The Colorado Division of Highways will provide further review on any specific development plans prepared after implementation of the Resource Management Plan. We are particularly interested in the projects which will require the transportation of energy products on the state highway system.

#### Cultural Resources

183-16 The plan adequately addresses general cultural resource issues. Page 2-18 should provide a timetable for developing the cultural resource management plan and review should involve the State Historic Preservation

183-17 Officer. Page 4-86 should state that in addition to evaluating cultural resources in open DMV designation areas, it would be necessary to mitigate adverse effects to any resources determined eligible for inclusion in the National Register of Historic Places.

#### Format

183-18 The summary tables provide an excellent means to compare alternatives. The tables should, however, be displayed on two facing pages for ease of reading, rather than front to back as shown now.

We appreciate the opportunity to comment on the Draft Resource Management Plan and will continue to work with the Bureau in final plan development.

Sincerely,

*David H. Getches*  
DAVID H. GETCHES  
Executive Director

DHG:kmb:0113

Route 1, Box 250  
Steamboat, CO 80481  
May 26, 1986  
US Bureau of Land Management  
455 Emerson St.  
Craig, Colorado 81625

Dear Bureau of Land Management:

I understand you are not protecting our public lands under your charge, failing to consider prime scenic and wildlife resources for wilderness designation, particularly the seven wilderness study areas in the Little Snake area. I also object to any road building or accommodation of ORV enthusiasts on our public land.

Finally I strongly object to your failure to adequately inform millions of citizens in the western U.S. about your land-use planning actions. Consequently your decisions have no legal validity.

Sincerely,  
*Robert F. Mueller*  
Robert F. Mueller

## COLORADO RIVER WATER CONSERVATION DISTRICT

May 29, 1986

DIRECTOR AND  
OFFICERS AND  
MEMBERS  
CHIEF OF BUREAU  
MANAGER  
VICE PRESIDENT  
TREASURER  
MEMBER

William J. Pulford, District Manager  
Bureau of Land Management  
Craig District Office  
455 Emerson Street  
Craig, CO 81625

Re: Draft Little Snake RMP/ETS  
and Wilderness Technical Supplement

Dear Mr. Pulford:

The Colorado River Water Conservation District ("River District"), a public agency created by the Colorado legislature to conserve and protect for Colorado the waters of the Colorado River System to which Colorado is entitled under the Colorado River Compact, appreciates this opportunity to comment on the Draft Little Snake Resource Management Plan (RMP)/Environmental Impact Statement (EIS) and accompanying Draft Wilderness Technical Supplement.

As you are aware, the River District has a license application (P-2747) pending at the Federal Energy Regulatory Commission (FERC) for the Juniper-Cross Mountain Project, which would consist of dams at the Juniper and Cross Mountain Canyons on the Yampa River. This multi-purpose project would provide water conservation and storage, power generation, and recreational facilities. As noted in the Technical Supplement, the River District has been decreed surface and storage water rights on the Yampa River in the N 1/4 S 1/4, Section 23, T. 6N., R. 99W., 6th P.M. Technical Supplement, at 3-51. The district also has a conditional storage right for 2,200 cubic feet per second, in connection with the proposed Cross Mountain Dam. In addition, the River District has conditional surface and storage water rights for the proposed Juniper Dam.

We concur in your well-reasoned recommendation that Cross Mountain Wilderness Study Area not be designated wilderness.

William J. Pufford, District Manager  
May 29, 1986  
Page -2-

As indicated in both the Draft RMP/EIS and the Technical Supplement, designation of Cross Mountain NSA as a special recreation management area (SRMA) with Cross Mountain Canyon as an area of critical environmental concern (ACEC) would protect the most important natural values of the area, i.e., naturalness of the canyon, the big horn sheep herd, and the opportunity for primitive recreation on the top of Cross Mountain, without prejudice to the Juniper-Cross Mountain Project or to oil and gas development. The vegetation and topographic features of Cross Mountain NSA could be represented in the National Wilderness Preservation System (NWPS) by no designating diamond peaks NSA, as the Draft RMP/EIS recommends. See RMP/EIS at 2-67; Technical Supplement at 8-1-4. Although the technical supplement rather optimistically states that "[i]f the privately owned water rights associated with the proposed Cross Mountain Dam project would not be irretrievably forfeited by wilderness designation," Technical Supplement at 4-31, realistically speaking, given the difficulties of securing unopposed Presidential approval of any water development in wilderness areas, designation of Cross Mountain as wilderness would effectively eliminate the potential for such development at this site, the last available in Colorado before the Yampa reaches Binosaur National Monument. The SRMA/ACEC alternative would not "irretrievably forfeit" water development, but would, at the same time, provide a certain degree of protection for Cross Mountain's existing values until such time as a decision is made regarding the Juniper-Cross Mountain Project or other water development in the area. This recommendation thus correctly balances the objectives of environmental protection and water development.

For similar reasons, we concur in the recommendation relating to the establishment of the Little Yampa/Juniper Canyon SRMA.

185-1 Although we support your recommendations relating to Cross Mountain and Juniper Canyon, we believe that the Draft RMP/EIS and Wilderness Technical Supplement should have been more candid in discussing, and given greater weight to the deleterious impact wilderness designation would have upon water conservation and storage and hydro-power generation in the Cross Mountain area. Water development is certainly a resource value as compelling as forestry, mineral extraction, or oil and gas in a region as arid as northwestern Colorado. It deserves to be treated more seriously than it has been in the Draft RMP/EIS and Wilderness Technical Supplement.

William J. Pufford, District Manager  
May 29, 1986  
Page -3-

185-1 The final RMP/EIS and Technical Supplement should explicitly state that wilderness development would almost certainly preclude water development, considering that Presidential authorization for water development in wilderness areas is an illusion. All alternatives should be evaluated with regard to their impact on the development of our most precious natural resource, water.

Very truly yours,  
*Roland C. Fischer*  
ROLAND C. FISCHER  
Secretary-Engineer

BCF/ems



1 June 86

Department of Interior  
Bureau of Land Management  
Craig District Office  
Little Snake River Resource Area  
1222 Industrial Ave.  
Craig, Colorado 81625

Dear Sirs:

I would like to make some comments regarding the designation of Cross Mountain as a wilderness area and what effect I believe it will have on the water rights on the upper Yampa River. In 1981, in the Sierra Club vs. Watt Case, the Supreme Court has determined the Federal Reserved Water Right doctrine as follows:

186-1 "When the Federal Government withdrew its land from the public domain and reserves it for a federal purpose, the government by implication reserves appurtenant water then unappropriated to the extent needed to accomplish the purpose of the reservation. In so doing, the United States acquires a reserved right in unappropriated water which vests on the date of the reservation and is superior to the rights of future appropriators."

In my opinion, this would have a devastating effect on any future development on the upper Yampa River and any of its tributaries. The reason I believe this is that the ruling states that this reserves appurtenant water to the extent needed to accomplish the purpose of the reservation and in this case the reservation would be designated as a wilderness area. Therefore, when one looks at the definition of a Wilderness Area, which is in effect untouched by human hands, it would seem to me that would require the same amount of water going through the canyon as it now. If that is the case, then as I remarked before, it would definitely stop or have a detrimental effect on any upstream development on the Yampa River and its tributaries. One of the implications of reserved water rights, or state water law systems, is the creation and maintenance of reserved rights which depend on any use beneficial or otherwise. The priority of a reserved right dates from the establishment of the federal reservation but may stay dormant for many years. Therefore, a newly discovered reserved right can be strong on junior users at any time resulting in preemption of their water rights. Also, the reserved water right claims by the Federal Government generally seek treatment flows, thereby, precluding future upstream development.

#### COMMISSIONERS

221 West Valley Way  
Craig, Colorado 81625  
824 5317

Thomas E. Lefevre  
District 1

Albert Camilletti  
District 2

Don Clayton  
District 3

(2)

186-1 Reserved water rights with relatively late priority dates can still be used to prevent seniors from changing their use in any manner if the Federal Government claims injury to its junior reserved rights.

Senator Bill Armstrong has introduced legislation in effect, asking to stop any designation of more wilderness areas until this problem can be addressed. I really believe that we should not designate this country as a wilderness area and jeopardize the upstream use as well as future upstream development of the Yampa River.

Sincerely,  
*Albert E. Camilletti*  
Albert E. Camilletti  
County Commissioner

ASC/cks

## **Responses to Public Comments**

# **RESPONSES TO COMMENTS**

## **LETTERS**

All comments on the Little Snake Resource Management Plan/Environmental Impact Statement are appreciated and have been considered. We responded to comments regarding concerns on whether all reasonable alternatives were adequately considered or whether all significant impacts, which would result from implementing an alternative, were addressed. Comments expressing an opinion, observation, etc., have not been responded to specifically, but they have been taken into consideration in developing the proposed plan.

Several comments have been received that question the costs of implementing the plan or the ability of BLM to fund the plan. All alternatives considered could be implemented to some extent, regardless of funding. It is unlikely that any alternative would receive complete funding. BLM does not control the amount of funds it receives, but annually requests funds to implement its programs. The plan serves as a basis for these funding requests, but there is no guarantee of any funding, because it is ultimately up to Congress to set the budget for each year.

## RESPONSES TO COMMENTS

- 2-01 A summary of the wilderness criteria and a discussion of the quality standards for analysis and documentation for all WSAs are presented in the Summary of the Wilderness Technical Supplement (WTS) to the Little Snake RMP/EIS. A discussion of BLM's wilderness process is presented in Chapter 1 of the WTS, and discussions of alternatives and resultant impacts are presented in Chapter 2. If you need information on these subjects, please see the respective sections of the WTS.

Several changes affecting wilderness in the Little Snake Resource Area have been made as a result of reviewing data and previous analysis and as a result of public participation. Five of the eight Wilderness Study Areas (WSAs), Cross Mountain, Ant Hills, Chew Winter Camp, Peterson Draw, and Vale of Tears, would be affected by these changes. Diamond Breaks, West Cold Spring, and Tepee Draw would not be affected. Cross Mountain WSA would be recommended as preliminarily suitable for inclusion in the National Wilderness Preservation System (NWPS). This recommendation includes leaving most of the WSA, except Cross Mountain Canyon Area of Critical Environmental Concern (ACEC), open to oil and gas leasing with no-surface-occupancy stipulations. It would be closed to all other mineral entry. Cross Mountain Canyon ACEC within the WSA would be recommended for a total mineral withdrawal. Wilderness values, threatened and endangered species, naturalness of Cross Mountain Canyon, and the resident bighorn sheep herd would be protected. The WSA and ACEC boundaries are shown on Maps 2-6, page 2-40, and Map 2-7a, page 2-41, of the WTS.

Ant Hills, Chew Winter Camp, Peterson Draw, and Vale of Tears WSAs would be preliminarily recommended as nonsuitable for inclusion in the NWPS; but rather than being dropped from further consideration as wilderness and from management under the Interim Management Policy, they would be carried forward for consideration as wilderness by Congress. (For more information on BLM's wilderness process, please see chapter 1 of the WTS.) These four WSAs share land forms with Dinosaur National Monument and, when considered with lands in the monument that are administratively proposed as wilderness, do have outstanding opportunities for solitude and primitive, unconfined recreation. They do not,

however, possess these qualities on their own. Ant Hills, Chew Winter Camp, and Peterson Draw WSAs are not separated physically and, therefore, could be combined into one WSA. This possibility was analyzed under the Combined WSAs Alternative in the WTS (Map 2-10, page 2-5).

The Vale of Tears WSA extends north, up from the Yampa River, through the monument into public lands administered by BLM (Map 2-15, page 2-100). Because of the land forms, characteristics, and values this WSA has in common with the monument, it is appropriate that it also be considered for wilderness by Congress. This WSA, however, does not contain outstanding opportunities by itself; therefore, it would not be recommended for inclusion in the NWPS.

Diamond Breaks (Map 2-5, page 2-27) would still be preliminarily recommended as suitable for inclusion in the NWPS, and West Cold Spring (Map 2-1, page 2-5) would be preliminarily recommended as nonsuitable. Tepee Draw (Map 2-4, page 2-90) would be considered nonsuitable and would be dropped from further consideration for wilderness and from management as wilderness under the interim management policy.

All the WSAs, with the exception of Tepee Draw, would continue to be managed under BLM's interim management policy until Congress decides whether or not to designate them as wilderness.

- 3-01 Subsidence from underground coal mining may occasionally occur; however, this method of coal mining is relatively common in the resource area, and no serious subsidence has occurred, to our knowledge, that has had a significant effect on recreation or wildlife resources. The Iles Mountain coal tract is adjacent to but does not overlap the boundaries of the Little Yampa Canyon Special Recreation Management Area, as delineated in the Preferred Alternative (Draft RMP/EIS) and the Proposed Resource Management Plan included in this Final EIS.

- 3-02 Under the proposed plan, new oil and gas leases would be subject to a no-surface-occupancy stipulation in the Little Yampa/Juniper Canyon SRMA, the Limestone Ridge ACEC/RNA, and the Cross Mountain Canyon ACEC. A withdrawal from mineral entry would also be sought for the Cross Mountain Canyon ACEC. At this time, BLM believes that the values in Irish Canyon ACEC, Lookout Mountain ACEC, and the Cold

## RESPONSES TO COMMENTS

Spring Mountain recreation and wildlife priority areas would be adequately protected through the management priority area designations which provide that additional mitigation could be required to protect the values for which the area was established (see discussion of Management Priority Areas in the Proposed Resource Management Plan in this document). Each area will be further evaluated in the oil and gas activity plan to determine whether additional mitigation for oil and gas development would be appropriate; see the proposed plan, Management Actions, Oil and Gas (Issue 1-2) for a discussion of this activity plan.

- 3-03 Leasing with no surface occupancy (NSO) in an area that is not economically accessible by directional drilling is not illegal. In fact, regulations provide authority to issue such leases. Specific policy on using the NSO stipulation has also been formulated from the Interior Board of Land Appeal decision [Robert G. Lynn (76 IBLA 383)]. (See Appendix 27.) The 43 CFR 3101.1-2 regulations in section 3101.1-2 of the Title 43 of the Code of Federal Regulations allow for the issuance of leases so stipulated as to absolutely bar exploration of the resource and make extraction technically infeasible where the lease is otherwise acceptable to the offeror.

The percentage of slope is not the sole criterion in the determination of the erosion rate. The most important factor is the method of construction; however, slope, precipitation and soil type are also important. Additional local factors may also be significant. BLM believes the best way to deal with high-angle slopes and other such problems is in case-by-case site-specific analysis with appropriate mitigation, which may include removal of the proposed location to a more easily mitigated site. This will be done at lease issuance.

Road construction solely for oil and gas development is "temporary" for the life of the development. However, since the RMP may be expected to last 20 years, which is close to the average life span of oil and gas roads in the resource area, these roads may be considered permanent for purposes of analysis. All mineral rights-of-way, not required for some other purpose, are rehabilitated to original contour when the mineral extraction is completed.

There is no reason to stipulate a blanket no surface occupancy within 1/4 mile of a water source. BLM's site-specific analysis is aimed at protection

of water sources by the best methods possible on a case-by-case basis at lease issuance.

The *Connors vs. Burford* decision pertained to the leasing of lands in the national forest system, and the Department of Justice is now appealing it. Pending the outcome of that appeal, BLM will continue leasing oil and gas under the RMP/EIS system.

- 3-04 Information about expiration dates of specific mineral leases or leases in specific portions of the Little Snake Resource Area can be obtained through BLM's Colorado State Office, Mineral Leasing Section (CO-943A), 2850 Youngfield Street, Lakewood, Colorado 80215. Locations of existing coal leases are shown on Map 3-2, page 3-18, of the Draft RMP/EIS. Locations of existing oil and gas leases are also contained in BLM's land status records, which may be reviewed in Craig, Colorado, at the Little Snake Resource Area Office, 1280 Industrial Avenue, or the Craig District Office, 455 Emerson Street, and in Denver, at the Colorado State Office, Records and Public Services Section, 2850 Youngfield Street. Reproducing and printing maps in the RMP/EIS showing all existing oil and gas leases in the resource area would be prohibitively expensive; over 90 percent of the resource area is currently leased for oil and gas, involving several thousand leases.

In addition, we do not believe that including the information you request in the RMP/EIS would be helpful in making RMP decisions or in choosing among alternatives. The need for no-surface-occupancy or other protective stipulations would be determined by the sensitivity of resources to surface-disturbing activities, not by the presence or absence of mineral leases. The one exception would be wilderness recommendations. Presence and location of pre-Federal Land Policy and Management Act oil and gas leases may affect manageability of an area as wilderness; alternatively, under alternatives that do not recommend wilderness designation, location and terms of existing mineral leases may affect impacts to wilderness values should those leases be developed.

- 3-05 Any range projects proposed in recreation, wildlife, or any other management priority areas would be mitigated to protect resource values. The use of water development as a tool to improve livestock distribution would be considered a more desirable method than fencing.

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3-06 Priority access in this case covers the acquisition of easements and rights-of-way across private land. Although the emphasis for acquisition is for forestry purposes, which include silvicultural treatments, public fuelwood harvesting, and insect and disease monitoring, the resultant access benefits other programs, most notably recreation, by providing public access to otherwise inaccessible public land. The identified access needs have nothing to do with subsidies for timber production or road construction.

3-07 See response to comment 2-01.

3-08 BLM believes avoidance stipulations will provide adequate protection to the resource. Site-specific activity plans may impose more restrictive stipulations on certain areas, depending on the proposed activity, including additional limitations on ORV use.

3-09 Hell's Canyon was studied for inclusion as an ACEC and was found to contain remnant plant associations; however, it was determined that special management protection was not necessary for the area as a whole and that adequate safeguards would be provided through avoidance stipulations. Cross Mountain Canyon ACEC would be closed to ORV use; ORV use in Lookout Mountain ACEC and Irish Canyon ACEC would be limited to designated roads and trails. See response to comment 3-02.

3-10 The goal of the proposed plan (as with all alternatives analyzed in the Draft RMP/EIS) is to provide for a variety of uses within multiple-use objectives and the sustained yield capability of the resources. BLM believes that managing the Colorado portion of West Cold Spring as wildlife, recreation and livestock priority areas would best meet this multiple-use goal.

The ORV activity plan to be prepared after completion of the RMP would delineate existing and designated roads and trails for all areas identified for limited ORV use in the proposed plan. The data that we have developed at this stage of the planning process is also available for public review at the Little Snake Resource Area office. (Please note that Cross Mountain Canyon ACEC would be closed to ORV use under the proposed plan.)

Lands along the northern boundary of the Little Yampa/Juniper Canyon SRMA were not included in the SRMA because the vast majority of suitable land there is privately owned and outside BLM's jurisdiction.

After analyzing the area, BLM determined that the Calico Draw area would not receive significant, adverse impacts to paleontological resources as a result of increased recreational access to the area.

3-11 40 CFR 1501.7 refers to issues that are significant to the proposed action. Although the Yampa River may be a significant resource, and impacts to that resource are considered in the Little Snake RMP/EIS, a recommendation to Congress to study the river is not significant to resource management planning for the Little Snake Resource Area.

A formal study for the portions of the Yampa River within BLM's jurisdiction has not been authorized by Congress. (Please note that a Wild and Scenic River study for the Kern River in California was mandated by Congress in the National Parks and Recreation Act of 1978, Public Law 95-625, November 10, 1978.)

An evaluation of the Yampa River against the designation criteria, as suggested in the comment, would not be helpful in making RMP decisions or choosing among RMP alternatives. Such an evaluation would merely document whether BLM agrees or disagrees with the inclusion of the Yampa River on the Nationwide Rivers Inventory List. BLM does not have the authority to either designate a river as wild and scenic or to remove a river from the Nationwide Rivers Inventory List. However, because the Yampa River is currently listed, BLM does have the responsibility (under the Wild and Scenic Rivers Act and NEPA) to consider the river in the RMP/EIS and to evaluate potential impacts to the river from the various RMP alternatives. We believe we have fulfilled these requirements in the RMP/EIS.

In addition, the RMP has identified the types of management to be applied to all recreation resources, in terms of the type of environmental settings and the types of recreational opportunities that are to be maintained or provided. As a result of this analysis, sections of the Yampa River within Little Yampa/Juniper Canyons and Cross Mountain Canyon have been proposed for protective management in the proposed plan. Nothing in the plan would prevent a Wild and Scenic River study being prepared for the Yampa River in the future if Congress authorized such a study.

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3-12 Under the proposed plan, the Diamond Breaks WSA, Cross Mountain WSA (including Cross Mountain Canyon ACEC), Limestone Ridge ACEC/RNA, and Irish Canyon ACEC are designated as unsuitable for rights-of-way. Lookout Mountain ACEC and other areas containing Colorado sensitive plants or remnant plant associations are classified as sensitive for rights-of-way and will be studied on a case-by-case basis to determine actual siting. In all cases, rights-of-way will not be allowed within any ACEC if they conflict with the values for which the ACEC was established. BLM believes that rights-of-way are compatible uses within other recreation and wildlife priority areas with appropriate mitigation. No rights-of-way corridors have been designated in the proposed plan.

3-13 The lands around Elk Mountain and Blacktail Mountain are identified for retention or exchange because they do not meet the criteria for outright disposal listed in Section 203 of FLPMA. Lands in the area are desirable for acquisition because of identified access needs. These areas are identified as other mineral management priority areas under all alternatives. These lands were not shown on the alternative maps because of their small size.

The line identifying the southern boundary for the Black Mountain acquisition/retention area was established, based on a proposed exchange that has been determined to be in the public's interest. The public land on Woodchuck Hill (except for most of that along Morrison Creek) would be exchanged for additional lands on Blacktail Mountain. Since these public lands were not identified in Appendix 24, they could only be disposed of by such an exchange, which would be a discretionary action that would only take place if the public's interest would be well served. Therefore, if an exchange were not completed, the lands would be managed subject to the same land tenure principles as lands lying in the retention area.

- 5-01 See response to comment 2-01.
- 6-01 See response to comment 2-01.
- 7-01 See response to comment 2-01.
- 8-01 See response to comment 2-01.
- 9-01 See response to comment 2-01.
- 10-01 See response to comment 2-01.
- 11-01 See response to comment 2-01.
- 12-01 See response to comment 2-01.

13-01 See response to comment 2-01.

14-01 See response to comment 2-01.

15-01 See response to comment 2-01.

15-02 See response to comment 3-11.

15-03 BLM does not imply that much of its current grazing land is unsuitable. BLM states that a large portion of acreage could be substantially improved through various structural or nonstructural improvements. Also see comment numbers 98-24 and 153-29.

In many cases, present data may indicate the need for changes in various grazing allotments; however, we recognize that much of this data was derived from a range-site inventory (see Appendix 4 in the draft RMP/EIS), which is not by itself adequate proof of actual stocking rates. This inventory, when combined with a 3- to 5-year monitoring study, should resolve many questionable variables recognized in the one-time inventory. BLM is required by its regulations (see page 2-14 in the Draft RMP/EIS) to monitor the results of grazing levels until adequate data are collected to justify a livestock reduction.

16-01 See response to comment 2-01.

17-01 See response to comment 2-01.

18-01 See response to comment 2-01.

19-01 See response to comment 2-01.

19-02 See response to comment 3-11.

19-03 See response to comment 15-03.

20-01 See response to comment 2-01.

21-01 See response to comment 2-01.

22-01 See response to comment 2-01.

22-02 BLM fully recognizes the important wildlife values of West Cold Spring and the five Dinosaur National Monument adjacent areas. Mitigative measures designed to protect the wildlife resources will be placed on oil and gas activities in these areas, as needed.

22-03 See response to comment 15-03.

23-01 See response to comment 2-01.

24-01 See response to comment 2-01.

25-01 See response to comment 2-01.

26-01 See response to comment 2-01.

26-02 See response to comment 3-11.



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27-01 See response to comment 2-01.

28-01 The water resource section did not include areas of potential water resource development, because BLM has no plans for major water projects. Most of the water resource development in the resource area consists of spring developments (small head boxes, pipe, and a livestock watering trough) and construction of stock ponds on ephemeral and intermittent drainage ways (all of these structures have dams less than 15 feet in height and storage capacities of less than 10 acre-feet).

Impacts of the various alternatives on future federal, state, and private water developments were not discussed, primarily because most projects would not be affected by any of the decisions made within the document; for example, water projects would not be precluded outright in most areas on BLM lands. The exception to this could be projects proposed within designated wilderness areas and special management areas. Impacts of these latter designations on future developments would depend on the specific development proposal and could only be assessed on a case-by-case basis.

Only Congress can designate an area as wilderness; BLM recommends areas for wilderness designation, based on a variety of criteria established and outlined under the Wilderness Act of 1964 and the Federal Land Policy and Management Act of 1976. Congress has recognized the problems of water rights for wilderness areas; therefore, we believe future designations of wilderness areas by Congress will address the issue of water rights to be included or excluded from those areas.

The Juniper-Cross Mountain project will require a comprehensive environmental impact statement to address the project and its alternatives. We believe it will be better to have a land-use plan in effect before BLM has to address the impacts of granting rights-of-way permits for this project. An amendment to the RMP can then be considered in conjunction with the EIS for the Juniper-Cross Mountain Project. It will be simpler to consider the impacts, positive or negative, on an existing land use plan, rather than weighing the impacts of the projects against the impacts of all various alternatives impacts. The issue of whether Cross Mountain should be used for wilderness, a dam, or both will be decided by Congress, as well as what water rights will be included if the area is designated as wilderness.

29-01 See response to comment 2-01.

30-01 See response to comment 2-01.

31-01 See response to comment 2-01.

32-01 See response to comment 2-01.

33-01 See response to comment 2-01.

34-01 See response to comment 2-01.

35-01 See response to comment 2-01.

36-01 See response to comment 2-01.

37-01 See response to comment 2-01.

38-01 See response to comment 2-01.

39-01 See response to comment 2-01.

40-01 See response to comment 2-01.

41-01 See response to comment 2-01.

42-01 See response to comment 2-01.

44-01 See response to comment 2-01.

45-01 See response to comment 2-01.

46-01 See response to comment 2-01.

47-01 See response to comment 2-01.

48-01 See response to comment 2-01.

49-01 See response to comment 2-01.

51-01 See response to comment 2-01.

52-01 See response to comment 2-01.

53-01 See response to comment 2-01.

54-01 See response to comment 2-01.

54-02 See response to comment 3-11.

54-03 See response to comment 15-03.

55-01 See response to comment 2-01.

56-01 See response to comment 2-01.

57-01 See response to comment 2-01.

58-01 See response to comment 2-01.

58-02 Ink Springs has been included as part of the Irish Canyon ACEC and is subject to protective measures detailed in the Special Designations section under Management Priority Areas in the proposed plan. G-Gap, Horse Draw and Hell's Canyon would not be designated as ACECs or RNAs, but any surface-disturbing activities would be subject to an avoidance stipulation to protect plant associations.

59-01 See response to comment 2-01.

60-01 See response to comment 2-01.

60-02 See response to comment 3-11.

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- 61-01 See response to comment 2-01.
- 62-01 See response to comment 2-01.
- 62-02 See response to comment 3-11.
- 63-01 See response to comment 2-01.
- 64-01 See response to comment 2-01.
- 64-02 See response to comment 3-11.
- 64-03 See response to comment 15-03.
- 65-01 See response to comment 2-01.
- 65-02 See response to comment 3-11.
- 66-01 See response to comment 2-01.
- 67-01 The RMP does not dictate the use of private land (see the description of Management Priority Areas in the proposed plan). Where private surface overlies federal minerals, the plan considers the impact of leasing (or not leasing) federal minerals and provides for mitigation of the impacts that would result if those minerals were developed. By requiring mitigation of impacts that would otherwise occur if the federal minerals were developed, a decision allowing mineral development could be made where otherwise a no leasing decision might have been made because of anticipated impacts.
- By making a decision to lease or not to lease, BLM sets in motion a chain of events that will impact the environment. When those impacts are to the private surface owner, the resolution of those impacts is left to the surface owner. However, certain impacts can go beyond the private surface. If these impacts are not acceptable to BLM, then they can be mitigated or a decision can be made not to lease. The FMCAs are designed to mitigate impacts to wildlife populations that are managed by the state of Colorado or to protect water quality downstream of leases.
- 68-01 See response to comment 2-01.
- 69-01 See response to comment 2-01.
- 70-01 See response to comment 2-01.
- 71-01 See response to comment 3-11.
- 71-02 See response to comment 15-03.
- 72-01 See response to comment 2-01.
- 73-01 See response to comment 2-01.
- 75-01 See response to comment 2-01.
- 77-01 See response to comment 2-01.
- 77-02 See response to comment 3-11.
- 77-03 See response to comment 15-03.
- 78-01 See response to comment 2-01.
- 79-01 See response to comment 2-01.
- 80-01 See response to comment 2-01.
- 81-01 See response to comment 2-01.
- 82-01 See response to comment 2-01.
- 84-01 See response to comment 2-01.
- 85-01 See response to comment 2-01.
- 86-01 See response to comment 2-01.
- 87-01 See response to comment 2-01.
- 88-01 See response to comment 2-01.
- 88-02 See response to comment 3-11.
- 89-01 See response to comment 2-01.
- 90-01 See response to comment 2-01.
- 91-01 See response to comment 2-01.
- 92-01 See response to comment 2-01.
- 93-01 Cultural resource management actions will be included in environmental assessments of off-road vehicle events when and if they occur. Identification of cultural resources and mitigation of impacts as a result of ORV use will be developed and included in the environmental documents and will be a condition of use. Casual ORV use in open areas can only be mitigated through surveying for cultural sites and through identifying mitigative measures, such as closing a site.
- 93-02 The Cultural Resource Class I narrative overview was being developed at the same time the RMP was being written. Therefore, the discussions in chapter 3 summarized what was known about prehistoric and historical resources at that time. The use of the automated data base is fully discussed in Appendix 21. This discussion includes how site numbers were developed. There is more to this figure than upland and lowland habitation. The "gross arithmetic projection" is also explained in this appendix.
- 93-03 Information management for organization of cultural resource information, description of the results of previous work for planning purposes, and integration of work into a systematic preservation effort is guided by BLM policy, Code of Federal Regulations, manual supplements, and laws. BLM is aware of the Secretary's Guidelines, and they closely correspond to what BLM does. The various data management systems maintained

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at the Little Snake Resource Area follow BLM guidelines. They are cited in the RMP.

Priority treatments and planning responsibilities are discussed in the RMP in a very general manner. Cultural resource management plans (CRMPs) will be developed. CRMPs will be developed to provide the cultural program with goals of its own. However, this phase of planning is activity planning and will be developed in implementation of the land-use plan. The RMP establishes that this work is required and that it will be conducted.

94-01 This letter is not a comment on the RMP/EIS.

95-01 See response to comment 2-01.

95-02 As required by NEPA, an environmental analysis will be prepared for each range, wildlife, and watershed project. These site-specific documents will address the impacts of the proposed action on threatened and endangered plants and animals and on identified remnant plant communities. We are not, however, introducing any nonnative species. Nonnative species that we plan on using for improvements were introduced decades ago. The impacts of these species have been confined to the immediate area where they were originally seeded.

95-03 See response to comment 3-11.

96-01 See response to comment 2-01.

97-01 See response to comment 2-01.

98-01 The comment cites only part of the analysis on page 4-24 of the Wilderness Technical Supplement, which contains a range of possible impacts from oil and gas development if Cross Mountain WSA were managed as an SRMA rather than as wilderness. As discussed on that page, development of the post-FLPMA leases depends largely on how soon Congress acts on designation or nondesignation of Cross Mountain WSA as wilderness. The pre-FLPMA lease has expired. All existing post-FLPMA leases will expire by 1992. If Congress were to release Cross Mountain WSA from wilderness consideration before 1992, the WSA protection stipulation would be dropped, and there is a low to moderate potential that some or all of the remaining leases would be developed. The section cited by the respondent is an analysis of worst-case impacts that could occur under these circumstances. If Congress were to release Cross Mountain after 1992, no leases would remain within the WSA and any new leases issued within Cross Mountain would carry no-surface-occupancy stipulations. The impacts of that situation are also analyzed on page 4-24 of the

Draft Wilderness Technical Supplement. Also see response to comment 2-01.

98-02 See response to comment 2-01.

98-03 The oil and gas potential for the Cross Mountain area was derived from public geologic data (maps, nearby well data, etc.) and not from proprietary information. The paragraph on page 3-46 of the Wilderness Technical Supplement referencing proprietary geophysical data was intended to note interest by industry in the area and should not be interpreted to mean that the BLM has geophysical data or that we have interpreted such data. The paragraph in question will be rewritten in the Final Wilderness EIS. The two paragraphs following this one enumerate our reasons for designation of Cross Mountain as moderate to high oil and gas potential.

98-04 The final intensive inventory of 1980 adjusted the boundaries of Diamond Breaks "to exclude small narrow pieces of public land extending from the bulk of the unit, where it was determined that opportunities for solitude were limited. This resulted in a more blocked configuration for the unit." BLM believes that this configuration provides a manageable wilderness area.

98-05 This comment refers to administrative actions outside the scope of the RMP/EIS. The comment has been responded to by letter.

98-06 Oil and gas lease C-36577 was erroneously issued contrary to Department of Interior and BLM directions concerning issuance of leases within WSAs. BLM's mistake was caused by a misinterpretation of the WSA boundary, which placed it along the township line between T. 10 N., Rs. 102 and 103 W., 6th P.M., rather than slightly east of (or criss-crossing) the township line in Section 6, T. 10 N., R. 102 W., 6th P.M.

The lease was not issued in violation of any congressional ban. That ban became effective on November 3, 1983. Between January 1983 and November 1983, leases were issued within WSAs with no-surface-occupancy stipulations on the lessee's showing that the lands were prospectively valuable for oil and gas.

BLM has informed the lessee that it considers the lease subject to the Interim Management Policy for WSAs. Corrective action is also being taken to make the lease subject to both the wilderness study area protection stipulations and a no-surface-occupancy stipulation for the lands in the West Cold Spring WSA. BLM has also suggested that the lessee request that the portion within and

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adjacent to the WSA be restored to a pending offer status. Regardless of the steps being taken, BLM will not permit any surface development of the lease within the boundaries of the West Cold Spring WSA, unless released from further consideration. BLM did consider cancelling the lease or revoking its issuance, but decided that such action would violate a clear decision of the Interior Board of Lands Appeals in a similar case, *Beverly M. Harris, Aminoil, Inc.*, 78 IBLA 251 (1984).

98-07 The Matt Trail, while not presently passable to vehicle traffic, is an obvious human imprint of man on the area. The regular use, hand maintenance, wide distribution, and the number of imprints east of the trail substantially affect the naturalness of the portions deleted. If the boundary had been drawn around each imprint, the net effect would have been numerous fingers of land without wilderness characteristics penetrating the unit. As a result, the eastern boundary was established at the Matt Trail.

98-08 See response to comment 98-05.

98-09 Pages 4-74 and 4-75 of the draft RMP/EIS address the value of wildlife to Colorado and specifically to northwestern Colorado. The values are based on previous BLM studies, as footnoted. Expenditures for recreation and hunting are based on Colorado Division of Wildlife areas that do not conform to the WSA boundaries. Therefore, no exact measurements are available for numbers of recreation visitor days or hunter days on any WSA.

In addition, increased demand for recreation and hunting is related to hunter satisfaction, area reputation, and other short-term variables. BLM concludes that hunter satisfaction would continue to be moderate to high, based on variables other than designation.

98-10 Admittedly, if Vale of Tears were designated as wilderness, it would contribute to the wilderness values of Dinosaur National Monument, if for no other reason than as a buffer. Our analysis, however, does not support the contention that by itself Vale of Tears contains outstanding opportunities for solitude or primitive and unconfined recreation, which is necessary to be considered suitable as wilderness. Also see response to comment 2-01.

98-11 No opinion has been expressed to us by National Park Service regarding wilderness designation of Vale of Tears.

98-12 BLM's knowledge of allotments #4306, 4308, and 4309, when combined with soil surveys and consultations with livestock operators, provided adequate detail for project planning. However, these allotments have not been inventoried by the ecological site method. A site-specific project feasibility and environmental analysis will be completed for all range projects before implementation to further analyze economic, beneficial, and harmful environmental impacts of each proposed project.

Additional information has been provided on page A4-1, which should clarify the lack of range site data listed under the "Undetermined Seral Stage" heading found in Appendix 6.

98-13 BLM is currently preparing a bureau-wide environmental impact statement that addresses the impacts of herbicide spraying. This document is referenced in Appendix 10 of the draft RMP/EIS. The specific chemicals, as well as mitigative measures to protect any rare plants and animals, will be decided when the allotment management plans and environmental assessments are written. Also, please see comment 99-02.

98-14 Appendix 9 has been modified to provide a more complete and concise summary of the identified problems and the associated proposed solutions. Regarding range projects, we considered only those projects proposed in the Preferred Alternative. In the Wilderness Technical Supplement, we analyzed the impacts to possible future projects in that area. These projects were proposed in the Commodity Production Alternative, but were dropped out of the Preferred Alternative.

98-15 The comment is correct. Although the Colorado State Director has the authority to remove Section 202 WSAs from further wilderness consideration, Chew Winter Camp, Ant Hills, and Peterson Draw will be referred to Congress for a final decision on wilderness suitability. However, when considered apart from Dinosaur National Monument, BLM's analysis concludes that the combined WSAs do not exhibit outstanding opportunities for solitude and primitive and unconfined recreation; therefore, BLM is not recommending the areas as suitable for addition to the National Wilderness System.

98-16 The issuance date for lease C-34238 was incorrectly stated as January 1, 1986, in the preliminary draft RMP/EIS. The correct date is December 6, 1982, when the lease was signed by the authorized officer. Also see response to comment 98-06.

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- 98-17 See response to comment 3-11.
- 98-18 Approximately 85 percent of the Little Yampa Canyon corridor is under lease for oil and gas, according to the oil and gas lease plats of October 1985.
- 98-19 The area of the Iles Mountain coal tract was evaluated in the Draft RMP/EIS through the same multiple-use process applied to the rest of the resource area. It was considered as a coal management priority area in the Energy and Minerals and Commodity Production alternatives and as a wildlife management priority area in the Renewable Resources and Natural Environment alternatives. Coal was determined to be the highest priority use in the Preferred Alternative in the draft RMP/EIS and the proposed plan in this final EIS. Impacts to the Yampa River were identified in the draft RMP/EIS; see Recreation, pages 4-55 through 4-69.
- 98-20 Although the Preferred Alternative continues to authorize livestock grazing over approximately 97 percent of our federal surface, it is not unregulated. Each allotment (or pasture) has specific seasons of use and restrictions on the amount of total use and number and class of livestock. The extensive range improvement projects are designed to improve the quality of our public range lands, as mandated by the Public Rangelands Improvement Act of 1978. The majority of funds for the proposed range improvement projects comes from grazing fees and private permittee contributions. All projects are planned and implemented in cooperation with the permittees.
- 98-21 A map showing allotment boundaries on those Section 3 allotments is being included in the final.
- 98-22 Documentation of a lower seral stage because of sagebrush domination is sufficient reason to plan wildlife and livestock forage production improvements; wildlife habitat improvements may be done by creating an edge effect (see glossary addition), and watershed enhancement may be done through sagebrush manipulation. The ability of a particular range to support a given number of livestock and wildlife over a particular season of use cannot be determined as easily. Many factors, including variable climatic conditions, fluctuating wildlife numbers, dietary overlap between species, and distribution problems, must be analyzed over a period of several years to document the actual use of various plant species.

BLM is required by the Taylor Grazing Act and the Public Rangeland Improvement Act of 1978 to provide for more range improvement projects designed to enhance forage production and habitat conditions for wildlife and livestock.

Ample information is available that supports improvements in forage conditions through mechanical range-site manipulation for the benefit of livestock and wildlife. Policies and regulations require that reductions be implemented only upon the availability of acceptable data to support reduction.

- 98-23 In reference to Table 3-9, page 3-42, the 37 percent determined to be unsatisfactory does not imply in any way that the lands are in "poor" condition. In reality, only approximately 2 to 3 percent of our inventoried acreages were shown to be in the low to poor seral stage. For planning purposes, unsatisfactory livestock forage is defined as those acreages that have a potential for significant increase in livestock forage through cost-effective livestock management. Many of the acres in unsatisfactory livestock condition are in medium or high seral stage (fair or good ecological condition). The figures represented in Table A6-2 are a closer representation of the present condition of our public rangelands. Narrative on page 3-42 has been expanded to explain this important concept.

- 98-24 See response to comment 95-02.

- 98-25 See response to comment 98-13.

- 98-26 This document does not establish coal leasing levels. That is done by the Secretary of the Interior and the Regional Coal Team, and such work is beyond the scope of this RMP. This plan does, however, establish a land-use planning groundwork for any leasing levels or proposed development that might occur in the future. The RMP is intended to eliminate only those lands that should not be considered further for leasing.

By no means will all of the acreage made available for further consideration for coal leasing by this plan be mined or even offered for lease, certainly not within the life of this RMP. Before BLM offers any new lands for coal lease, a detailed site-specific environmental analysis will be done.

Even if a recommendation for no new coal leasing remains in effect throughout the life of this plan, that only refers to regional competitive lease sales such as the Green River - Hams Fork Round 1 coal lease sales held in 1981 and 1982.

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Emergency lease applications can and, most likely, will continue to be submitted.

Although the coal market today is in a slump, 10 years ago it was also in a slump and it has since boomed and slumped again. Therefore, we think it would be unwise to assume the market could not "boom" again in the next 10 years.

The land-use planning groundwork in this plan will enable BLM to respond more quickly and efficiently if another "boom" does occur, while avoiding frequent amendments to the RMP. It also provides industry with a variety of coal quality with which to meet future market needs. If the coal market remains depressed, there will be no change in the status of the lands.

- 98-27 We are confused by this comment. No page references were made; therefore, we are not sure what the comment is specifically addressing. The Draft RMP/EIS does not state that there would be a moderate impact to oil and gas development from closures to leasing. The Draft Wilderness Technical Supplement does identify a potential long-term impact on oil and gas manageability within areas such as the Cross Mountain and West Cold Spring WSAs if they were designated as wilderness areas. These areas are rated to have moderate to high potential for occurrence of oil and gas.

Please see pages S-4 and 2-75, the Preferred Alternative columns for oil and gas, and page 2-63. These tables show that 44 percent of the federal oil and gas acreage is restricted to varying degrees, not to 2 percent as suggested in the comment. The level of impact to a resource depends on the quality of the resource that is being affected. The loss of a number of acres considered to be of low-resource potential is much less significant than the loss of the same number of acres considered to be of high-resource potential.

The purpose of this land-use plan is to provide a framework within which future on-the-ground decisions concerning management of public lands will be made. There is no intent to analyze impacts or decisions that may or may not have been made in the past. Rather, this plan applies resource-area wide, even though over 90 percent of the resource area is currently under lease. When leases expire and the lands become available for leasing consideration again, the decisions developed in this plan will be applied.

- 98-28 BLM is not planning on using the indicator species concept for monitoring riparian or other important habitats in the Little Snake Resource Area. BLM is planning on using such parameters as species diversity, species richness and relative abundance, which would measure all species within a habitat and not concentrate on just the indicator species.

- 98-29 The prescribed burn locations for the Preferred Alternative do not include the area under the Vermillion Bluffs Research Natural Area.

- 98-30 BLM has reanalyzed the oil and gas management priority prescription for the Wild Mountain Area proposed under the Preferred Alternative. There appears to be a relatively low potential for and interest in oil and gas development in the area. A variety of recreational settings, opportunities and experiences are available in this area for public utilization. Based on our reanalysis of these factors, BLM has decided to redesignate the Wild Mountain area as a recreation management priority area because of the recreational values available in this area.

- 99-01 Table 3-13, page 3-47, has been revised to reflect the addition of bonytail chub.

- 99-02 Grasshopper and Mormon cricket control are not land-use allocation decisions and therefore are not appropriate for consideration in an RMP. Control of insect or disease damage to public lands managed by BLM within the resource area will be evaluated on either a case-by-case or program basis, depending on the situation. The Mormon cricket control program in Utah and Colorado is being administered by the USDA Animal and Plant Health Inspection Service (APHIS), which has published the Rangeland Grasshopper Cooperative Management Program Final EIS, as supplemented (USDA 1986), which analyzes the impacts of the control program.

- 99-03 See response to comment 3-11.

- 99-04 See response to comment 2-01.

- 99-05 Because unsatisfactory (see definition in glossary) rangelands have a potential for increased production of livestock and wildlife forage, it does not mean that they are presently overstocked. Selected range improvement projects are designed to improve the quality of our public rangelands, as mandated by the Public Rangelands Improvement Act of 1978.

The ability of a particular range to support a given number of livestock and wildlife use cannot be adequately determined by a one-time inventory. Although useful for planning purposes, many

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factors, including fluctuating wildlife numbers, dietary overlap between species, distribution problems, and variable climatic conditions, must be analyzed over a period of several years to document the actual utilization of various important plant species.

100-01 As a result of public comment and an internal review of the impact analysis in the Draft RMP/EIS, the proposed plan has been revised to allow leasing for development through surface mining within soil/water federal mineral concern areas and within wildlife, soil/water, livestock, and forest lands/woodlands management priority areas. Leasing for development involving surface mining of federal minerals other than coal would be allowed in wildlife federal mineral concern areas. Any such development, however, would have to comply with existing laws and regulations, and special stipulations could be placed on this development, in addition to standard stipulations, to protect important, unique, or fragile resources of concern to the federal government. This means that identified adverse impacts to such resources would have to be mitigated to an acceptable level, as determined by the authorized officer, subject to valid existing rights. (See Proposed Little Snake Resource Management Plan, Management Priority Areas.)

101-01 The coal development potential ranking procedures were used to facilitate the impact analysis and the coal development potential screen (screen 1, page A2-1 of the Draft RMP/EIS). This ranking system concerns only those lands within the delineated coal planning areas.

Lands that fell in the different interest level areas were then placed in the Rocky Mountain Oil and Gas Association (RMOGA) rating system (Appendix 3) for discussion throughout the resource area on a level comparable to other mineral resources. This was not done in such a specific manner for mineral resources other than coal, because the level of data concerning other minerals would not permit such an analysis.

101-02 Text has been changed accordingly.

101-03 We have clarified and corrected the discussion under the heading Coal (Issue 1-1), item 1 on pages 2-31, 2-38, 2-44, 2-53, and 2-62 of the draft RMP/EIS and in the proposed plan to address your concern about a discussion of the cumulative loss of the coal that has been determined to be unsuitable for surface mining. Please see Appendix 2 (page A2-1, paragraph 2)

for the discussion concerning potential modification of unsuitability decisions.

We do not consider the coal resource associated with the 242,300 acres to be "lost," because it has not been rendered forever unminable. It is, however, unminable as long as conditions warranting the unsuitability determination exists and sufficient coal to meet the energy demands of the nation is available elsewhere.

We have not discussed this coal in greater detail because the largest percentage of the acreage (surface owner consultation and unsuitability) consists of small parcels throughout the coal planning area (see maps A2-2 and A2-3). A discussion of coal quality and characteristics under these parcels is virtually impossible.

The large parcel of land in Township 8 North, Range 90, 91 West determined to be unsuitable for surface mining because of wildlife concerns overlies coal in the Tertiary Fort Union Formation. Dames and Moore (Open File Report 79-819, 1979) reported there was not enough data in this area to determine surface minable reserves with any degree of certainty. They interpreted the sparse existing data to indicate the coal would be recoverable by underground methods only.

Most of the lands within the coal planning area that are considered unacceptable for further consideration for surface mining because of multiple-use tradeoffs occur where either the coal has been eroded away (Axial Basin) or geologic conditions are unfavorable for the occurrence of surface minable coal (Cedar Mountain).

101-04 We used the term "critical" in reference to game species habitat to be consistent with Colorado Division of Wildlife terminology. We have included a definition of "critical habitat" as a text change in this document.

102-01 Threatened and endangered animals and plants would be protected the same under all alternatives; therefore, BLM believes it would be repetitious to include them under each alternative. Threatened and endangered wildlife have been added to the Summary Table. (See page 2-14, Wildlife Habitat, in the Draft Little Snake RMP/EIS.) Threatened/endangered, candidate, and Colorado BLM sensitive plants were identified as a separate issue, primarily in association with designation of potential ACECs and RNAs.

102-02 Tables 3-11 and 3-13 have been revised.

102-03 Page A 2-11. Text has been revised.

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102-04 Text has been revised to reflect the addition of *Cirsium ownbeyi*.

103-01 See response to comment 2-01.

104-01 See response to comment 2-01.

105-01 Site-specific proposals for sanitary facilities are not part of this RMP. Presently, nine pit-type toilets exist on BLM land within the resource area. Depending on funding, a few more may be installed within the next 10 to 15 years. At that time, site-specific analysis of local groundwater and surface water resources will take place before the sanitary facilities are constructed.

Presently, there are no plans to permit sanitary landfills or solid-waste disposal facilities on BLM-managed land. BLM policy is to deny approval for such facilities; instead, BLM would attempt to sell or exchange land parcels to the party interested in constructing the facilities.

Water wells developed on BLM lands would primarily be for livestock or wildlife consumption. Well pads are designed to drain off excess water. Livestock will invariably concentrate around water sources; however, the well casing and platform are designed to prevent normal contamination by livestock. Some well sites may require fencing to prevent damage to the structure and water contamination.

Before surface or underground disposal of fluids is approved, the BLM and the Colorado Oil and Gas Conservation Commission must review possible impact from coal mining on page 4-38. Detailed analysis of the lowering of groundwater levels and aquifer destruction would be dependent on site-specific variables, and a discussion of these would certainly take place during the environmental analysis that would be prepared before a coal tract would be offered for leasing.

106-01 Wilderness and other values for Cross Mountain are explained on pages 3-43 through 3-54 of the Wilderness Technical Supplement. Cross Mountain and other WSAs within the Little Snake Resource Area have been thoroughly inventoried and have been under study since 1979. See response to comment 2-01.

107-01 See response to comment 2-01.

107-02 BLM is aware of its lack of cultural resource data within the Cross Mountain and West Cold Spring WSAs. BLM's Wilderness Study Policy (Federal Register, Wednesday, February 3, 1982, Vol 47, No. 23, page 5106) indicates that cultural resources are optional or supplemental for

designations of areas as WSAs. Therefore, these optional wilderness characteristics were considered "supplemental" during the BLM wilderness inventory, and intensive cultural resource surveys were not carried out in these areas. However, what was known about cultural resources was applied when assessing the overall value of an area as wilderness.

107-03 Irish Canyon was inventoried for wilderness characteristics but did not meet the mandatory criteria for wilderness. The unique qualities of the area have been recognized and are identified within an ACEC (Area of Critical Environmental Concern).

108-01 See response to comment 2-01.

109-01 Approximate locations of the FMCAs are shown on the oversize maps with the management priority areas for each alternative. This information has been added to the discussion on page 2-5; see text changes.

These areas have been analyzed for potentially surface minable coal resources (see proposed plan). Because of a lack of data, or because development was not precluded by the FMCAs, no attempt was made to analyze resource development potential for other minerals, including oil and gas.

109-02 The Uncommitted Mitigation section contains mitigative measures that could further reduce environmental impacts beyond those required by the land-use plan or other mitigative measures required by BLM as part of its permitting processes. Uncommitted mitigative measures in this section are either those that BLM does not have the authority to require or those that BLM does not believe are necessary at this time to bring the level of anticipated impacts down to an acceptable level. When site-specific proposals are evaluated through the NEPA process, some of these uncommitted mitigative measures, which BLM has the authority to require, may be necessary to keep environmental impacts within acceptable levels. The word "would" was in error and has been changed to "could" in the errata section of this document.

If, in site-specific-impact analysis, it was found to be necessary to require a private company to compensate for lost public access by opening private lands for public recreation as a condition of a lease, the company could open lands under its control to recreational use by the public or it could lease rights for public recreation on other private lands as hunting rights are often leased. BLM is making no commitment at this time to



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- require any measures in the Uncommitted Mitigation section. Some of these measures cannot be required by BLM; but they could be required by some other agency, or voluntarily done by a private company or volunteer group.
- 109-03 Many of the plant species protected in the RNAs are not palatable to cattle and are not located in areas that are likely to receive cattle use. Although it is possible that remnant plant associations could be damaged through cattle use, proper grazing management and use monitoring would prevent degradation of the remnant plant associations and would maintain the integrity of the RNA.
- 110-01 See response to comment 2-01.
- 111-01 See response to comment 2-01.
- 112-01 See response to comment 2-01.
- 113-01 We believe that ORV use on public lands administered by the BLM is a legitimate recreational use of these lands under the multiple-use concept. A significant and growing number of public land users value the relatively unconfined recreational opportunities still available on BLM-administered public lands.
- ORV activities occurring within the Little Snake Resource Area will be monitored on a regular basis to ensure that any adverse impacts caused by ORV use can be minimized and mitigated in an acceptable manner
- Site-specific management actions such as the posting of ORV restricted signs will be initiated during the implementation phase of the RMP.
- Table 8 in the proposed plan delineates those areas proposed for designation as open, limited, or closed to ORV use.
- The majority of the Sand Wash Area outside of the main channel of Sand Wash itself has been proposed for designation as open to ORV use under the Proposed Plan.
- 114-01 See response to comment 2-01.
- 115-01 Using numbers for wildlife enables BLM to better assess impacts to wildlife populations and compare different population levels in the various alternatives to the Colorado Division of Wildlife's Strategic Plan. The conclusion in the proposed plan (i.e., to continue managing for CDOW's 1988 strategic objectives until monitoring is completed) was based on the analysis of other alternative levels of management in the draft RMP/EIS.
- 115-02 References are made to monitoring studies on pages 2-61, 2-64, and A9-1. Appendix 14, page A14-1, provides a general discussion of monitoring and evaluation. No specific monitoring plan is addressed in the RMP. Analysis Assumptions and Guidelines on page 4-1 states that funding will be available to implement and supervise the selected alternative of the RMP, which includes a monitoring program.
- 115-03 The wildlife numbers used in each alternative were developed during a meeting on April 8, 1985, attended by BLM, Colorado Division of Wildlife (CDOW), and local ranchers. Because a consensus could not be reached, an average between the numbers requested by CDOW and those requested by the ranchers was used. It is important to note that these numbers, as depicted in the Preferred Alternative, portray an initial short-term reduction of approximately 10 percent for both livestock and wildlife. Over the life of the plan, increased AUMs, through development of livestock project proposals, could possibly recapture AUMs lost during the initial reduction, if all proposed range improvement projects were funded, implemented, and fully successful. Wildlife is expected to benefit from many of these proposals, although data are insufficient to project whether long-term wildlife numbers would increase, and if so by how much. Until future monitoring studies have been completed and proper utilization levels have been established, BLM would also continue to recognize Colorado Division of Wildlife 1988 Strategic Plan Objective wildlife numbers. Further consultation, coordination, and negotiation with CDOW and future monitoring studies would focus on identified wildlife/livestock conflict areas (see Appendix 16); levels would be established to meet multiple-use objectives (see page 2-64).
- 115-04 Actual livestock use versus preference is discussed on page 3-42 of the Draft RMP/EIS.
- 115-05 Table S-1 on pages S-5 and 6 reflect the initial adjustments for each alternative. Table 2-35, pages 2-76 and 77, reflect long-term forage availability that could be possible through projects and intensive management systems. Appendix 12 gives an allotment-by-allotment analysis of these short- and long-term adjustments.
- 115-06 The economic values used in table 4-20 are for willingness to pay and are based on a study done by Moore and Schumacher on the western slope of Colorado. The values were updated to 1984 (the date the tables were prepared).
- 116-01 See response to comment 2-01.

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117-01 See response to comment 2-01.

118-01 Soil condition is projected to decline under the Current Management, Energy and Minerals, and Commodity Production alternatives; however, it is projected to stabilize or improve under the Renewable Resource, Natural Environment, and Preferred alternatives. A table showing estimates of salt tonnage for the Yampa River, Little Snake River, and Vermillion Creek has been added to the Affected Environment section.

With the data available to us, we cannot make any absolute, quantitative projections of how the different alternatives will affect salt loads within Little Snake Resource Area streams, because (1) we cannot predict the locations and amounts of acreage that could be disturbed from activities under the various alternatives; and (2) salt content within soils is highly variable, even within the same stratigraphic unit. Although salt loads would vary from alternative to alternative within tributary streams, differences probably would be insignificant within the Colorado River.

118-02 BLM recognizes that a problem exists with grazing in riparian areas. Instead of an "across-the-board" exclusion of livestock from these areas (fencing all riparian areas would be prohibitively expensive), BLM will look at problem areas case-by-case and then decide whether or not to exclude livestock. This is stated in the proposed plan under Issues 2-5 and 2-6, item 5.

Oil and gas operations wanting to locate in riparian zones will also have to undergo a case-by-case analysis before approval is granted. Guidelines are stated in the proposed plan, under Issues 2-5 and 2-6, item 2.

Within fragile soil and water areas, NSO stipulations were analyzed under the Natural Environment and Renewable Resource alternatives. Very stringent performance standards will be implemented within fragile areas under the Proposed Plan, Issue 2-5 and 2-6, item 2.

118-03 In fragile soil and water areas, ORVs are restricted to existing roads and trails. BLM believes that this level of restriction will achieve the desired protection. Also, because both "restricting" and "closing" an area would involve signing only, one would not be harder than the other to enforce.

118-04 As stated on page 4-41, the significance of the impacts would depend on the amount of timber harvested and the proximity of the harvest area to streams. Each proposed timber harvest will be assessed in a site-specific environmental assess-

ment, and the relationship between potential benefit versus potential damage will be analyzed. Timber stands within much of the area are undergoing severe mortality from mountain pine beetle and other insect and disease infestations. Salvage operations and cultural treatments through timber harvests designed to save existing timber stands and salvage dead timber stands may appear to have "negligible value of the timber" but in the long run would enhance value to the timber as well as other resources.

118-05 The paragraph on page 4-34 deals with a possible disadvantage of wilderness designation that is real. No matter what amount of AUMs may exist in an allotment, livestock will tend to congregate in "desirable" areas (such as a watering area). This congregation could cause erosion problems, which would then be more difficult to fix, because of limitations on the types of projects that could be implemented to redistribute livestock. The paragraph does not state that this is occurring within WSAs; it simply states that it is a possibility.

118-06 See response to comment 2-01.

119-01 See response to comment 2-01.

120-01 Issues would be resolved by using the definitions of compatible/excluded uses for each kind of management priority area, as described beginning on page 2-2 of the draft RMP/EIS and in the Proposed Resource Management Plan section of this final RMP/EIS.

120-02 This BLM office has only conducted ecological site inventories since 1981 (see Appendix 4). Please see Appendix 6, page A6-14 and Table 4-6, page 4-14. These range-site conditions verify our findings that the majority of our BLM lands are in high fair, good, and excellent conditions, with only 3 percent actually in poor condition.

We are also in agreement that the results of a one-time inventory can often be a reflection of variable climatic situations. Therefore, we are not issuing grazing decisions solely on the merit of a one-time inventory; we are also analyzing livestock and wildlife use over a 3- to 5-year period. Also see response to comment 153-29.

121-01 "Wilderness Values" refers to those criteria used to determine suitability, as published in the *Federal Register* Vol. 47 No. 23, Chapter II, c. An alternative was analyzed in the Wilderness Technical Supplement (WTS) that combined the Ant Hills, Chew Winter Camp, and Peterson Draw WSAs. The WTS also stated that these WSAs have outstanding wilderness values in

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- conjunction with Dinosaur National Monument. The legal basis of our wilderness inventory process, which was completed in 1980, is contained in Sections 603 and 202 of the Federal Land, Policy and Management Act of 1976 (PL 94-579). The wilderness inventory was completed in November 1980 (please see Chapter 7 of the Wilderness Technical Supplement). Outstanding or unique features were not the only factor evaluated in determining suitability. See response to comment 2-01.
- 122-01 See response to comment 2-01.
- 123-01 See response to comment 2-01.
- 125-01 See responses to comments 67-01 and 154-38.
- 125-02 Page 2-11 refers to compatible and excluded uses on research natural areas and outstanding natural areas as they apply to all alternatives, except the Preferred. Oil and gas leasing was allowed in ONAs with no-surface-occupancy stipulations just as it was in RNAs. Under the Proposed Plan, Issue 3-2 describes those special management areas recommended and the general type of restrictions that will apply. It should be noted that no ONAs are proposed under the proposed plan.
- 125-03 See response to comment 109-03.
- 125-04 The discussion of oil and gas impacts on page 4-24 and 4-26 of the draft has been revised.
- Regarding temporary versus permanent loss of wildlife, the only time we project permanent loss is in an area where wildlife populations are assumed to be at carrying capacity, as discussed on page 4-26, 3rd paragraph.
- 125-05 A map has been included in the Final RMP depicting the estimated potential for the occurrence of oil and gas throughout the resource area.
- 125-06 We believe that the surface disturbance and visual impacts associated with leasable mineral development would adversely affect certain recreational setting and opportunities currently available in the special recreation management areas. It would be desirable, from the standpoint of recreation management, to avoid those adverse impacts; however, from the stand point of multiple-use management, more flexibility in allowing certain levels of multiple-use development is preferred. Also see response for comment number 109-02.
- 127-01 The requirement to conduct a multiple-use tradeoff analysis was fulfilled through the formulation and analysis for RMP alternatives, which examined various tradeoffs among resource uses and values. The process was used to develop all alternatives, including the Preferred Alternative; it is described on pages 1-2, 1-4, and 1-5 of the Draft RMP/EIS.
- 127-02 See response to comment 67-01.
- 127-03 Table 3 provides an oil and gas potential rating for the no-new-leasing and no-surface-occupancy designations combined. The 36,240 acres of no-new-leasing under the proposed plan are contained in the proposed Diamond Breaks Wilderness Area. The 52,775 acres to which no-surface-occupancy stipulations will be attached are found in the specific listings of the LSRA Oil and Gas Umbrella Environmental Analysis. A map depicting the approximate oil and gas potentials of the resource area has been included in this document to show the relationship of oil and gas potentials to management priority areas.
- Access would be denied across no-new-leasing (i.e. proposed wilderness) areas and no-surface-occupancy (i.e., critical wildlife habitat, RNAs and recreational areas) areas. Most of the NSO areas are small and could easily be avoided by new access routes.
- 127-04 See response to comment 125-06.
- 127-05 See response to comment 109-02.
- 127-06 Though the potential for oil and gas is moderate to high in some special management areas, these areas have been identified as a priority area for special features and will be managed as such. Ninety-eight percent of the resource area is available for oil and gas exploration, as opposed to 1.9 percent of the area in special management areas that are also available, but with some restrictions. Also see response to comment 109-03.
- 127-07 See text changes for pages 4-24 and 4-25 of the draft RMP/EIS.
- 127-08 See response to comment 127-07.
- 127-09 The only special management areas with no-surface-occupancy stipulations are Limestone Ridge RNA and Cross Mountain Canyon ACEC. Specific restrictions are detailed in the proposed plan under Management Priority Areas, Special Designations. Known geologic structures do not occur in any special management areas under the proposed plan.
- 127-10 The "blanket restrictions" identified for sensitive areas are general measures that may be required, based on the analysis of compatible/excluded uses for specific types of management priority areas (see the proposed plan). Any actual stipulations

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that may be incorporated in a right-of-way grant will be written in a manner consistent with current BLM policy and BLM's Right-of-Way Handbook, which emphasizes the use of performance standards.

See proposed plan, Major Rights-of-Way, Issue 4-2.

- 127-11 See response to comment 127-03.
- 127-12 See response to comment 125-05.
- 128-01 See response to comment 67-01.
- 128-02 See response to comment 127-03.
- 128-03 See response to comment 109-02.
- 128-04 In the Natural Environment and Renewable Resource alternatives, NSO stipulations would be attached to all new leases within fragile soil and watershed areas. In contrast, special performance standards, rather than NSO stipulations, would be attached to all leases within the fragile areas under the Preferred Alternative and the proposed plan. See the description of management actions, Soils and Water Resources (Issues 2-5 and 2-6) in the proposed plan.
- 128-05 See responses to comments 109-03 and 127-06.
- 128-06 See response to comment 127-07.
- 128-07 See response to comment 127-10.
- 128-08 See response to comment 127-03.
- 129-01 See response to comment 2-01.
- 130-01 See response to comment 2-01.
- 130-02 See response to comment 98-15.
- 131-01 A complete discussion of wilderness suitability for Ant Hills and Chew Winter Camp is available in the Summary Analysis and Recommendations table beginning on page 5-6 of the Wilderness Technical Supplement. See response to comment 98-15.
- 132-01 See response to comment 2-01.
- 133-01 Site-specific management actions such as the development of trails, signing and the organization of various recreational events will be initiated during the implementation phase of the RMP.
- We recognize that multiple-use activities may be synchronized, in some cases, by the season of use during which each of the multiple-use activities in question normally occurs.
- We also recognize and strongly support the use of volunteers in the maintenance and enhancement of various natural resource values on public lands.

- 133-02 See response to comment 133-01.
- 133-03 We realize that impacts from different kinds of ORVs may vary, depending on the type of ORV and/or season of use. BLM believes, however, that any kind of ORV use would be inappropriate and would cause damage within the fragile soil and water areas. The kinds of ORV restrictions BLM is proposing are listed in the Off-Road Vehicle Designations tables under all of the alternatives.
- 133-04 See response to comment 133-01.
- 133-05 Once the plan is approved, it and all BLM land-use plans can be amended, as provided in BLM's planning regulations (43 CFR 1610.5-5). As stated in those regulations, "An amendment shall be initiated by the need to consider monitoring and evaluation findings, new data, new or revised policy, a change in circumstances or a proposed action that may result in a change in the scope of the resource uses or a change in the terms, conditions and decisions of the approved plan."
- The Craig District Advisory Council covers three resource areas and is not governed by the land-use plans.
- 133-06 See response to comment 133-01.
- 134-01 See response to comment 2-01.
- 134-02 See response to comment 3-11.
- 134-03 See response to comment 15-03.
- 134-04 See response to comment 99-05.
- 136-01 See response to comment 2-01.
- 137-01 See response to comment 3-11.
- 137-02 See response to comment 2-01.
- 137-03 See response to comment to 108-02.
- 137-04 See response to comment 15-03.
- 138-01 See response to comment 2-01.
- 139-01 The range of alternatives was constrained by current laws and regulations governing each resource. BLM is commissioned to lease oil and gas, as well as other minerals, except where prohibited by law. These prohibitions are listed in the various mineral acts and 43 Code of Federal Regulations, Part 3100. In effect, if the lands do not meet the conditions for exception, they are open for mineral leasing.
- 139-02 All of the BLM rangeland has been inventoried over the past 50 years, using various methods. Our current existing livestock Grazing Preference

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AUMs are a reflection of these surveys. This RMP/EIS is currently considering the latest range inventory, which has classified the lands according to the Soil Conservation Service method of ecological site mapping (see Appendix 4.) This is an ongoing process that gradually expands our baseline data.

We agree that baseline inventories for some wildlife resources are lacking; however, none of the recommendations for wildlife protection currently included in the RMP deal with specific actions but rather refer to the resource area as a whole. We are proposing to conduct monitoring and inventories for 5 years, as well as require detailed inventories for specific activities so that adequate protection of wildlife resources can be accomplished.

- 139-03 Archeological protection plans or cultural resource management plans are generally discussed in the RMP deal with the development of cultural resource management plans. These plans, which will provide for the protection of cultural resources, will be developed after the RMP becomes final and activity planning has been conducted, based on the RMP.
- 139-04 See response to comment 98-28.
- 139-05 Please see response to comment 139-01. Long-term natural values are protected from oil and gas development by lease stipulations such as seasonal restrictions in calving grounds, avoidance for remnant plant associations, no surface occupancy for threatened and endangered species (see summary on page 2-63 of the draft RMP/EIS), and construction requirements on easily erodible soils (page 2-64). Also see the various management actions in the proposed plan in this document.
- 139-06 The information requested in regard to the private sector would vary from mine to mine; also, the information if available is proprietary and cannot be published.
- 139-07 See response to comment 2-01.
- 139-08 A botanical field survey was conducted in the resource area during 1983. As a result of this survey, no threatened or endangered plant species were discovered in the Beaver Creek drainage. Additionally, no archaeological surveys have been conducted within the drainage and no known prehistoric or historical sites have been identified. Wildlife and natural values within the drainage were judged not to meet the relevance or importance criteria for designation as an ACEC.

Therefore, special management area status has not been proposed for this area.

- 139-09 See responses to comments 3-02, 3-09, and 3-10.
- 139-10 Water developments and other management practices would be used as the preferred method of livestock control. In wildlife critical wintering areas where fences are necessary, they would be designed to accommodate wildlife movement.
- 139-11 See response to comment 3-11.
- 139-12 BLM recognizes that a high-erosion potential exists on steep slopes. Under the Preferred Alternative (page 2-65, Issues 2-5 and 2-6), very stringent performance standards have been developed for activities occurring on steep slopes. If the performance standards could not be met, then a no-surface-occupancy stipulation would apply. These performance standards are also in the proposed plan.
- For Limestone Ridge RNA and Cross Mountain Canyon ACEC, no-surface-occupancy stipulations have been applied. Avoidance stipulations have been applied to Irish Canyon and Lookout Mountain ACECs. See page 2-68 under Issue 3-2.
- 139-13 There is no indication that local woodsmoke pollution control ordinances will be enacted in the resource area in the near future. People in the western portion of the resource area (Craig, Maybell, Lay, Elk Springs) are the major users of domestic firewood. The potential for serious winter inversion layers in these areas is lower than the mountain areas of the Front Range, and, without a major population increase, the chance of serious woodsmoke pollution is small.
- 139-14 See response to comment 113-01.
- 139-15 RNAs are considered unsuitable for placement of major rights-of-way under all alternatives. Also see response to comment 154-05.
- 139-16 The BLM is not trying to imply that the needs of either group are incompatible. The intent of this section is to point out differences in social "demand and dependency" that exist and often vary according to one's perspective. The alternatives considered in this plan are ways of meeting local, regional, and national needs from various perspectives. Nonmechanized forms of recreation are an important use provided for in the proposed plan.
- 140-01 See response to comment 2-01.

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- 141-01 This statement refers to streams on BLM-administered land within the Little Snake Resource Area and not streams on national forest lands. The text (page S-2 in the Wilderness Technical Supplement) has been revised to clarify this.
- 141-02 Peregrine falcons have been reported in Cross Mountain Canyon (two adults in 1984), but no nests have been located (Pers. Comm. Steve Petersburg, National Park Service and Jerry Craig, Colorado Division of Wildlife, 1986). Cross Mountain Canyon, because of its high cliffs and lack of human activity, offers good potential for peregrine falcon nesting (Pers. Comm. Jerry Craig, 1986). Prairie falcons are fairly common and nest throughout the Little Snake Resource Area.
- 141-03 See response to comment 28-01.
- 141-04 We believe that the designation of Little Yampa/Juniper canyons as special recreation management areas will preserve a variety of unique recreational opportunities such as kayaking and float boating, while allowing for other uses such as oil and gas development through the issuance of leases with no-surface-occupancy stipulations.
- The Yampa River below Craig through Little Yampa Canyon and Juniper Canyon does receive float boating use, as witnessed through on-the-ground observations, visits to the local BLM offices by users, and correspondence received from users. Although some people do float the Yampa River for fishing, most of the users who contact the local BLM offices say that float boating is their primary objective.
- 141-05 The use of the phrase "float boating" in the sentences quoted was in error. The phrase "general tourism" should have been used. This change is in the errata for page 3-71 of the Draft RMP.
- 141-06 All economic information about Moffat County was obtained from either the Bureau of Economic Analysis (BEA) or the Colorado Division of Local Government's Planning and Assessment Model (PAS). The BEA data for 1985 are 1984 computations. The PAS data are updated by the state of Colorado at least two times a year. Population for Craig in 1981 approached 12,000; the data used in the economic projection in 1985 did show a decline to approximately 8,500. All other data would show similar ratio declines.
- 141-07 Acceptable population figures were not available for elk and pronghorn antelope for more than a 5-year period. The text has been revised to clarify this.
- 141-08 BLM recognizes the knowledge possessed by local livestock operators; however, the Colorado Division of Wildlife is the only entity that systematically collects wildlife population data year after year. Their population estimates are based on state-of-the-art and scientifically acceptable methods. Also see response to comment 115-03.
- 141-09 BLM believes that both adverse and beneficial impacts of coal development identified in the draft RMP/EIS are reasonable projections, given that only very broad generic information about future coal development is considered in the RMP. The RMP and decision is the determination of which areas are available for further consideration for coal leasing. Detailed information concerning locations of future coal tracts and mines, size of mines, and price of coal—all necessary for detailed economic and social analysis—are not available at the RMP level, nor needed for the RMP decision.
- The importance of coal development to northwest Colorado was recognized on page 3-20 (Demand and Dependency sections) and 3-78 (last paragraph) of the draft RMP/EIS.
- Broad economic impacts—all of them beneficial—were identified on page 4-71 (last two paragraphs) and page 4-72 (Table 4-18) of the draft RMP/EIS. (Please note that the employment figure for 1985 should be 961, not 9,234; the corrected table can be found in the Text Corrections as Table 4-18a.) BLM does not currently foresee more than a modest increase in coal-related employment to the year 2000. Based on regression analysis over a 30-year period, BLM's projections indicate increased coal production in northwest Colorado from 11 million tons at present up to 20 million tons by the year 2000, depending on demand. If the demand for northwest Colorado coal increases significantly during the life of the RMP, coal production and related employment may also increase significantly over current estimates. The amount of coal made available for further leasing consideration by the RMP would be more than adequate to meet future industry needs. A general discussion of monies returned to Moffat and Routt counties from mineral development has been added to Text Corrections. As noted in that discussion, however, projections about future amounts and distributions of such monies cannot be usefully made at this time, because of the rapid mine fluctuations in the mineral industries.

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- 141-10 These rights-of-way are not precluded. Coal-related facilities are allowed in all but one surrounding management priority area. Although the Little Yampa/Juniper Canyon Special Recreation Management Area would generally preclude major rights-of-way, it would not preclude coal-related facilities, such as rights-of-ways, needed for development of the Iles Mountain coal tract.
- Because of the limited amount of public surface within the coal planning area, it would not be appropriate for BLM to designate corridors for surface rights-of-way within that area.
- 141-11 The figures used in the RMP for surface and underground recoverable coal resources were compiled from a series of U.S. Geological Survey open file reports by Dames and Moore (see Reference section, Page R-3). Since there are 36 of these reports, it was deemed uneconomical as well as unnecessary for the general planning purposes of the RMP to print a map with that level of detail. The Dames and Moore publications are available for review at the Craig District Office, 455 Emerson St., Craig, CO, or can be ordered from U.S. Geological Survey, Western Distribution Branch, Box 25286, Denver Federal Center, Denver, CO 80225.
- 141-12 The difference between land classification or zoning and BLM's land-use plans is that zoning controls the use of all lands subject to the authority of the zoning government, regardless of ownership; and BLM's land-use plans only control how BLM will administer (manage) federal lands and minerals under its jurisdiction. Also see response to comment 67-01.
- 142-01 See response to comment 67-01.
- 143-01 See response to comment 2-01.
- 144-01 See response to comment 2-01.
- 145-01 See response to comment 2-01.
- 146-01 See response to comment 2-01.
- 147-01 A map of the Section 3 allotments is being provided in the final RMP/EIS. Please see response to comment 98-24.
- 147-02 See response to comment 98-20.
- 147-03 A vital part of public lands management will be done through intensive management systems. Each system will have to be designed according to local situations, which may include traditional systems, holistic management systems (Savory), or many other innovative systems. It is beyond the scope of this document to analyze all of the available grazing systems.
- 147-04 As described on page 2-53 of the draft RMP, the Natural Environment Alternative "favors management practices and uses of the public land that would not detract from the *natural setting within the constraints of multiple use*" (emphasis added). Each alternative considered in the RMP must be a complete, reasonable resource management plan that is capable of being implemented. BLM believes that all of the alternatives in the draft RMP are multiple-use alternatives that meet the above criteria and provide a reasonable range of multiple-use choices. Please note that the Natural Environment Alternative proposes 344,900 acres as suitable for further consideration for coal leasing, not 638,800 acres, as stated in the comment.
- 148-01 See response to comment 2-01.
- 149-01 See response to comment 2-01.
- 150-01 See response to comment 2-01.
- 152-01 See the explanation of Management Priority Areas in the proposed plan.
- 152-02 See response to comment 67-01.
- 152-03 See response to comment 141-10.
- 152-04 Data on most of the 638,758 acres in the coal planning area is sparse, but it does indicate the presence of coal seams at least 5 feet thick, with less than a 15 percent dip. However, because of the sparseness of data, we do not know if these seams are laterally consistent, much less if they are actually minable. We have included these lands as interest level 3 areas (low-development potential) because there has been coal exploration activity here in the past that yielded the existing data, and there could conceivably be activity in these areas in the future.
- 152-05 BLM's criteria for delineating unsuitability areas is described on page A1-2 of Appendix 1 and A2-1 of Appendix 2 in the draft RMP. BLM's determination of areas with coal development potential did not center around whether an area would be mined in the foreseeable future.
- The two-township FMCA 1 area north of Craig was included in the coal planning area primarily because of proximity to existing coal leases. In T. 8 N., R. 89 W., the west boundary of existing federal coal lease C-0125957, approximately 6,424 acres of state lands, has been leased for coal. This and the sparse existing data indicate that these lands could have potentially minable

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federal coal, as described on page A1-2 of Appendix 1.

All unsuitability decisions in this plan will be reviewed in conjunction with a site-specific environmental analysis before approval of any action on the lands.

152-06 See response to comment 3-11.

152-07 The upper unit of Little Yampa Canyon has a railroad, powerline, primitive roads, and other scattered improvements that are classified in the Rural Recreation Opportunity Spectrum (ROS) class, as noted in the RMP. Other areas in the upper unit of the canyon fall into the semiprimitive-motorized ROS class. Float boaters must float through and use public lands in the upper portion of the Little Yampa Canyon, because appropriate access points are lacking at Milk Creek. BLM believes it would be inappropriate to manage the public lands in only half of the river corridor now available for recreational use. Management of the river corridor as a Special Recreation Management Area, as outlined under the Preferred Alternative, would help maintain existing recreation settings as well as opportunities and experiences, while allowing for appropriate levels of development to occur.

152-08 All of the management decisions are subject to law and valid existing rights (page 2-2). Therefore, maintenance of the existing railroad right-of-way will be allowed in the Upper Little Yampa Canyon Special Recreation Management Area (SRMA).

We have no information, nor can we construe that the SRMA would adversely effect coal development in the Danforth Hills.

Acquisition of a water right does not guarantee the ability to develop that water right, especially across public lands.

As stated on page 2-69, no new utility or transmission corridors or rights-of-way would be allowed in the SRMA, except in relation to prior rights and necessary development associated with the Iles Mountain tract, if leased.

152-09 The Prevention of Significant Deterioration (PSD) amendments to the Clean Air Act designate the Little Snake Resource Area as a Class II attainment area. Regardless of special recreation area and/or special management area designations by BLM, the PSD Class II attainment designations will not change; therefore, existing surface mines will not be affected by BLM management decisions concerning special recreation and special management areas.

152-10 Mule deer critical winter range in Axial Basin does not contain significant reserves of surface minable coal. The area is rated as favorable for the occurrence of oil and gas, based on industry response. Under the Current Management and Energy and Minerals alternatives and the proposed plan, surface mining, including associated facilities and rights-of-way, and oil and gas development could occur in critical mule deer winter range in Axial Basin, resulting in loss of carrying capacity of those areas disturbed.

152-11 For purposes of impact analysis only, BLM specialists assumed that critical winter range was at or near carrying capacity. We do not have any information to show that the deer population is above the carrying capacity of the winter range. We recognize that severe losses to wildlife populations could occur on critical winter range anywhere in the resource area during harsh winters, even without any additional disturbance to the habitat.

We tried to provide a general explanation of possible impacts to big game in Axial Basin so that the reader could compare impacts between the alternatives. A more sophisticated and detailed impact analysis will be completed when and if specific lease proposals or specific mine plans are developed.

152-12 The best available information concerning potential locations of coal mining activities indicated that up to 10 strutting grounds and associated nesting areas could be disturbed. In addition, the discussion of impacts was directed toward strutting grounds and associated nesting and not brood-rearing areas. BLM specialists assumed that if strutting grounds and nesting areas were mined, there would be impacts to sage grouse. Specific impacts of mining proposals and their significance in regard to sage-grouse populations will be analyzed on a case-by-case basis during coal activity planning and again during mine-plan development.

152-13 With continued leasing and development of coal resources in the Little Snake Resource Area, some public lands will no longer be available for public recreational use. Since we do not know in which areas future leasing and development will occur, statements in the RMP are a generalization of the possible effects that cannot be quantified.

152-14 The sentence should read, ".... including Trout, Middle, and Foidel creeks and several tributaries within the Milk Creek basin (Turk and Parker 1982)...." Changes were made in the text.



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152-15 Yes, you are right. This paragraph will be deleted.

152-16 See response to comment 28-01.

153-01 The information has been incorporated into this document. See Appendix 26.

153-02 BLM believes that the Little Snake RMP/EIS meets the requirements of the Federal Land Policy and Management Act.

153-03 BLM has reviewed the draft RMP Preferred Alternative in light of public comments and has made revisions to various management actions that BLM considers to be appropriate. Overall, BLM believes that the proposed plan contained in this Final RMP/EIS is a multiple-use plan consistent with the requirements of FLPMA.

153-04 Long-range development plans are encouraged for those rare cases where the initial operator can foresee several years development and believes that development may have adverse impacts. However, there is no legal requirement for such a submission. In the vast majority of lease-holds, development occurs in three stages. Most leases are acquired for speculation, i.e., the hope that something will be found on or close to the lease, such as geophysical data, geological interpretation and extrapolation, and nearby discovery, thereby making the lease a candidate for exploratory drilling. Eighty percent of all leases issued are terminated with no activity occurring because none of the above happens to increase the value of the lease.

If the presence of hydrocarbons is suspected on the lease, exploratory drilling is initiated. Depending on the size of the lease tract and the nature of the suspect production zone, several wells may be drilled. In most cases only one well is required to show nonproductivity. Ninety-seven percent of the wells drilled on leases in this phase are nonproductive, and lease development ceases.

The leases found capable of production will have further exploration drilling and development. Usually it is in this phase when the lease is unitized. As stated in the RMP/EIS, annual development plans are required of units. About 80 percent of all federal producing wells in the LSRA come from unitized leases.

Plans of development are not essential to the orderly development of a lease. Indeed, they could be counterproductive, because development plans would necessarily change as more wells are drilled and more resource information becomes available.

153-05 An oil and gas activity plan will be prepared after completion of the RMP. This activity plan will include an environmental document analyzing the cumulative impacts of reasonably foreseeable oil and gas development in the Little Snake Resource Area. See Text Changes for page 1-11 of Chapter 1.

153-06 See response to comment 3-03.

153-07 Seasonal restrictions would not apply to maintenance and operations of producing wells. The oil and gas activity plan to be prepared after completion of the RMP will analyze impacts of oil and gas development and consider additional site-specific mitigative measures, if appropriate. Also see Text Changes for page 1-11 of Chapter 1 of the draft RMP/EIS.

153-08 See response to comment 153-05.

153-09 BLM believes that the RMP/EIS adequately evaluates impacts of minerals management actions proposed under the various RMP alternatives. The RMP does not contain "extensive proposals for oil and gas development" or a "proposal for dramatically increased coal leasing." The RMP determines which areas would, or would not, be available for future oil and gas leasing and with what overall restrictions; the latter will be considered in more detail in the oil and gas activity plan to be prepared after completion of the RMP. The RMP makes no coal leasing proposals whatsoever; it identifies which areas would, or would not, be available for further consideration for leasing during later coal activity planning. The 104,261 acres determined unsuitable under 43 CFR 3461 (including the 37,960 acres cited in the comment) are not "unsuitable for coal leasing"; they are unsuitable for surface coal mining operations. The unsuitability criteria are a coal planning screen. They are not to be used to determine availability for leasing or development of minerals other than coal. Also see responses to comments 153-5, 158-24, and 158-31.

153-10 The RMP provides direction regarding the extent areas would be open or closed to leasing when existing leases expire. It is not the purpose of the RMP to propose modifications to existing lease terms. No-surface-occupancy stipulations would generally pertain only to new leases, since these stipulations may not be consistent with the rights contained in most existing leases. Lesser restrictions identified for specific areas in this RMP would be added to applications for permit to drill on existing leases in those areas, if appropriate and if consistent with lease rights granted.

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- 153-11 See response to comment 153-05.
- 153-12 The coal planning area includes the lands for which we have coal resource information to estimate quantity and quality of the coal. Coal is present outside the planning area, but we have no data for these lands so they were excluded.
- Regulations 43 CFR 3420.1-2 require that we issue a Call for Coal Resource Information and respond to interest expressed by industry.
- Land-use planning (multiple-use and environmental review) is needed the most on lands surrounding existing or proposed leases and on lands where industry has expressed some interest in future development of coal resources.
- Also, please see paragraph 1, items 1 through 4 on page A1-2 in Appendix 1 and paragraph 1 under "Coal Development Potential (Screen 1)," page A2-1 in Appendix 2, in the draft RMP/EIS.
- 153-13 Although exception #3 under Criterion 11 allows the surface management agency to decrease the size of buffer zones, the BLM would be required to consult with U.S. Fish and Wildlife Service under all alternatives considered in the RMP.
- 153-14 The discrepancy was discussed with the U.S. Fish and Wildlife Service personnel in Grand Junction, and they concur with the dates we have specified.
- 153-15 The four stream sections not recognized in tables A2-7 and A2-8 are covered and discussed in the Results section under criterion 19. These sections were determined unsuitable through previous activity planning efforts and were carried forward under the discussion of results because the delineation was done based on 300 feet adjacent to each bank of the mainstream channels verses the contour line approach used in tables A2-7 and A2-8.
- The five sections of Wilson Creek are also covered in the Results section under criterion 19. Sections 5 and 8 in T. 3 N., R. 93 W., are contained in existing coal leases, to which by regulation we do not apply unsuitability. The three sections along the Yampa River were inadvertently left out. These sections will be added to Table A2-7 in the final.
- 153-16 All aspen communities are important to wildlife; however, only certain areas within these communities would be considered critical to wildlife. We do not, at this time, have adequate information to determine which areas are critical and, as a result, cannot designate all aspen as unsuitable. During coal activity planning, data will become

available that will allow BLM to designate areas as unsuitable under criterion 15, if appropriate.

We realize that mortality and other short-term impacts will take place on the 504,620 acres, and we must accept some short-term loss; but most of this area can be reclaimed and should not be declared unsuitable. The 37,960 acres include areas where reclamation may not be successful and where we cannot accept any adverse impacts because of its extremely critical nature.

- 153-17 There are two complete PRLAs and a portion of one PRLA within the boundaries of the Little Snake Resource Area. Two of them (C-3605 and C-3606) are on the Colorado/Wyoming state line and were analyzed in the Savery FEIS, which was filed with EPA in 1983. Unsuitability analyses were prepared as part of the initial stages of preparation of that EIS. The decision document for the Savery FEIS was issued in 1983, and a final showing was received from the applicant in 1983. Thus, all unsuitability and environmental analysis for these PRLAs was completed before development of the Little Snake RMP, and therefore are outside the scope of the RMP.

The third PRLA is on the boundary between the Little Snake and White River Resource areas (C-0126998). It is being handled by the White River Resource Area; therefore, it also is outside the scope of the Little Snake RMP.

- 153-18 One tract, the Little Middle Creek, shown on both maps, was leased by application in December 1985. No other tracts within Colorado have been leased.

Map 3-2 only shows those leases, PRLAs, and proposed tracts located in the Little Snake Resource Area. The map in the Green River/Hams Fork DEIS includes the entire coal region, including three resource areas in Colorado and four resource areas in Wyoming. None of the tracts have been reconfigured, and we know of no other discrepancies between the two maps.

Map 3-2 was included in the RMP in order to illustrate the general locations of existing leases and the proposed lease tracts within the area.

- 153-19 None of the changes identified in response 153-18 affect the RMP coal decisions, since the RMP only identifies areas acceptable for further consideration for leasing. The proposed lease tracts shown on Map 3-2 of the draft RMP/EIS were included in the unsuitability review, surface owner consultation, and multiple-use analysis conducted in the RMP. Since the RMP does not propose

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leasing of specific coal tracts, it would not be appropriate to incorporate comments on the Draft Green River-Hams Fork Round II Draft EIS, which does deal with specific leasing proposals. If coal activity planning is resumed, public comments will be appropriately considered in the development of activity level environmental documents.

- 153-20 The Draft Green River-Hams Fork Round II EIS was prepared in 1981-83. At that time, projections involving coal mining and related growth in northwest Colorado were considerably higher than they are now. The Little Snake RMP uses more recent and more conservative estimates of probable coal development to the year 2000, and consequently projects fewer related impacts overall. In addition, the significant impacts identified in the Draft Green River-Hams Fork Round II EIS were based on proposals to lease and develop coal tracts in identified areas, using site-specific development scenarios (type of mine, probable location of facilities and transportation routes, etc.). Consequently, impact analysis could be considerably more specific and precise than is necessary or possible in an RMP, in which decisions are made only about availability of areas for further consideration for coal leasing.

The RMP does identify impacts (some of them potentially significant) to air quality, vegetation, wildlife, soils, water resources, recreation, cultural resources, and paleontological resources. However, the analysis correctly concludes in many cases that the likelihood, location, extent, or significance of such impacts cannot be precisely determined without site-specific development plans or scenarios such as would be used in environmental analysis associated with coal activity planning.

- 153-21 See responses to comments 158-24 and 158-32.
- 153-22 No lands under the jurisdiction of the U.S. Forest Service are included within the coal planning area. Therefore, consultation was not necessary.
- 153-23 The multiple-use tradeoff screen was applied and is discussed on page A2-23 of the draft.
- 153-24 The draft plan does not analyze potential mitigative methods for coal mining impacts, mainly because the mitigative methods would be dependent on site-specific parameters such as type of mining, location of mining, type of geology, etc. BLM will look at mitigative methods at the leasing and mine plan stages.

The draft plan does not propose quadrupling acreage available for coal leasing; it proposes quadrupling the area to be considered for coal leasing. The acreage that actually may be leased in the future would be further analyzed in a detailed environmental impact statement before leasing.

BLM cannot deal with (from a mitigative standpoint) the current water quality problems associated with coal development, because these areas are already leased. The state of Colorado has the primary regulatory authority over existing mining operations. What BLM can and will do is consider the water quality problems that are presently being experienced and make future leasing decisions based in part on this knowledge. BLM is well aware that some areas may not be suitable for mining because of the potential water quality impacts.

See the Preferred Alternative, Issues 2-5 and 2-6, pages 2-64, 2-65, and 2-66 and Appendix 17, Page A17-1 for a complete listing of mitigative measures concerning water quality.

See Affected Environment, Water Resources, pages 3-52 and 3-53 and Appendix 23, Page A23-1 and Environmental Consequences, Water Resources, pages 4-31 through 4-34 for a complete description and analysis of the kinds of water quality problems that exist within the Little Snake Resource Area.

See Appendix 17, page A17-1 for a complete listing of the possible types of salinity control projects and other erosion control techniques that are being considered for sites within the Little Snake Resource Area. At this time, we have not identified which kind of project will be implemented at a particular site. This will be done at the activity plan stage.

- 153-25 See response to comments 153-18, 153-19, and 158-31.
- 153-26 The effects of diligent development and related regulations on existing leases is not considered to be within the scope of the Resource Management Plan.
- 153-27 Unsuitability criteria were not applied to lands under existing coal leases in the RMP, pursuant to 43 CFR 3461.4-2.
- 153-28 The RMP/EIS has used the best data available to project possible allotment AUM adjustments. Although the figures are adequate for planning purposes, a detailed monitoring system is needed to provide data sufficient for actual decisions.

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- 153-29 See response to comment 99-05.
- 153-30 The full impacts of these activities will be assessed in detail during the planning and environmental assessment stages of the individual projects.
- 153-31 Consistency with state and local plans is limited by consistency with the purposes of the Federal Land Policy and Management Act of 1978 (FLPMA) and other federal laws. It would not be possible to provide habitat to maintain CDOW's proposed population numbers and still provide for other uses, as required by FLPMA.
- 153-32 Reproducing and printing these maps in the RMP at a scale that would be comprehensible would be prohibitively expensive. In addition, the RMP is designed to provide broad direction or guidance for future resource management, not detailed activity level planning and analysis such as would be considered in a habitat management plan or coal activity planning document, for which the Colorado Division of Wildlife maps would be more useful. BLM believes that the RMP adequately analyzes and displays wildlife information needed to make RMP-level decisions. The CDOW maps are available for review at the Little Snake Resource Area, 1280 Industrial Avenue, Craig, Colorado.
- 153-33 We agree that baseline wildlife data are deficient, and we are proposing to conduct monitoring and inventories for 5 years to gather the necessary information needed to prepare detailed management actions.
- 153-34 Please see page 2-14, items 3 and 4 under Wildlife Habitat (Issue 2-2). This resource specific guidance is common to all alternatives and provides for inventory, monitoring, and management of riparian areas.
- 154-01 This level of analysis is sufficient to determine which areas should be given preference for mineral development. Coal and other mineral resources were not automatically given priority over other resources. Priority needs for all resources were considered before the resource to be given preference in any one alternative was selected.
- 154-02 BLM has revised the management priority area designations and believes that they comply with FLPMA. As discussed on page 2-2 of the draft RMP/EIS, all management priority areas are managed for multiple use. Although each priority area would receive management emphasis for development, management, protection, or use, many and frequently all other uses would continue. Identification of management priority areas was

based on the best available data, public comments and concerns, long-term public interest and benefits, identified impacts and conflicts, as well as the principles of multiple use and sustained yield. Management priority area boundaries or definitions of compatible or excluded uses may be adjusted in the future, and the RMP amended if necessary, based on new resource data or proposals for site-specific actions.

- 154-03 See response comment 67-01.
- 154-04 The Preferred Alternative was developed after the effects of the other alternatives were examined. This process resulted in the development of an alternative for protecting the fragile soil and water areas without a strict no-surface-occupancy stipulation. The Federal Mineral Concern Areas (FMCA) were developed in this manner. The definition of soil and water FMCA's has been modified to allow for more case-by-case consideration for federal mineral development.
- 154-05 Corridors from adjoining areas would not be blocked by "unsuitable" areas identified in this RMP. The RMP would, therefore, be compatible with other such documents, since reasonable routes through the area can extend from or to these corridors (none of which has actually been designated in a technical sense).
- 154-06 The statement, "stands still in existence are threatened by livestock grazing," is a broad generalization concerning many of the plant associations in Colorado and does not apply to the special management areas in the Little Snake Resource Area. This statement was mistakenly included in the Draft RMP and will be omitted in subsequent revisions.
- In addition, the second paragraph of the second column on page A22-2 states that Limestone Ridge is critical winter range for elk. Limestone Ridge is considered high-value elk winter range and a concentration area but is not designated as critical. Correction will be made.
- 154-07 Management objectives concerning the Little Yampa/Juniper Canyon area are for public lands administered by BLM; BLM has no authority to regulate recreational use of non-BLM lands. We recognize that public lands, public roads, and in this case, the river provide the only legal access to public lands, unless prior permission has been obtained from the appropriate landowners or administrators.

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Colorado state law Section 18-4-S04-5, CRS (1973) does not authorize adjoining landowners to prohibit or otherwise control river floating use; the Colorado Attorney General's opinion of August 31, 1983, states, in part, "... one who floats upon the waters of a river or stream over or through private property without touching the streambanks or beds does not commit a criminal trespass...."

Under the Preferred Alternative of the RMP, the Little Yampa/Juniper Canyon Special Recreation Management Area designation was proposed in order to protect certain recreation settings, opportunities and experiences currently available on public land in that area.

154-08 The Little Yampa/Juniper Canyon Special Recreation Management Area includes only BLM surface; no private, state, or other non-BLM surface estate was incorporated. Specific management concerns, such as access, would be considered in the activity plan to be prepared for managing this SRMA. Appropriate consultation with affected or interested parties would occur at that time.

154-09 Livestock grazing is the most extensive use of the resource area, and it exerts a substantial impact on the vegetative resource if not properly managed. However, the document does not imply that livestock is the "sole source of adverse effects on forage." Dietary overlaps between wildlife and livestock have not been properly analyzed, which is stated on page 2-62 under Livestock Grazing, paragraph 2. Grazing use would be authorized at present levels (grazing preference) until additional monitoring studies have been completed that would substantiate baseline data within those identified conflict areas. Further consultation, coordination and monitoring studies, to establish levels to meet multiple-use objectives, would take priority in those areas where resource conflicts are occurring. A monitoring plan will be printed as a supplement to the Rangeland Program Summary, which will address wildlife/livestock conflict areas.

The positive and negative impacts of livestock/wildlife use have been expanded on pages 4-14 and 4-15. See text changes for page 4-15 of the draft.

154-10 The population figures presented on page 2-64 represent the population objectives for the Preferred Alternative, whereas the population figures shown in Table 3-12, page 3-44, represent the existing estimated populations.

Elk numbers on page 2-64 are in error and have been corrected. See the Errata section.

The actual percentage of elk using BLM land is 31 percent, but the figure was rounded to 30 percent to be consistent with the percentage figures for the other species. To avoid any further problems, the figure has been changed to reflect the actual percentage.

The figure of 7,500 pronghorn on BLM land is in error and has been corrected. The figure of 7,500 for a resource area wide population is correct and represents the population objective under the Preferred Alternative and not the total existing resource area population of 8,400, as shown on Table 3-12, page 3-44. The figure of 75 percent represents the difference between a population of 6,300 on BLM land and a population of 8,400 resource area wide.

154-11 Specific plans for riparian systems will be incorporated into any intensive management system. Complete analysis of various types of systems is beyond the scope of this document.

154-12 This statement is in error and has been corrected. We are aware of the trail along Beaver Creek and that livestock are trailed through the canyon.

154-13 The 20 riparian transects are the only quantitative studies that have been completed in the resource area. Based on observations, livestock use is obviously affecting the condition of much of the riparian areas. Big game species may concentrate in riparian areas, but for short periods of time with no long-term damage. Big game use was judged by signs such as tracks and fecal remains.

154-14 Economic data is presented by county; no data is available for just public land. We agree that skiing revenue is generated from other than BLM land; however, it represents a major share of local income, and is appropriate for inclusion as part of the economic make up of Routt County in the Affected Environment chapter. It was not BLM's intent to show any resource in a good or bad light. The purpose of providing data on the economic make up of the resource area is to provide a base (the existing conditions) against which impacts of the alternatives considered can be compared. None of the alternatives analyzed in the RMP/EIS were based on the value of skiing in the Little Snake Resource Area.

154-15 Tables for minerals, livestock, personal income, and agricultural earnings are on page 3-80 on the draft RMP/EIS. Tables showing ranch budget models are in Appendix 13. These ranch budget

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tables show changes in income, employment, and forage for each alternative.

Since the data for each category are compiled from different sources, the presentation is different. Data on economics are obtained from the Bureau of Economic Analysis on a county-by-county basis; there is no way we can break it down for just public lands.

- 154-16 True, logical mining units are often composed of both private and federally owned minerals when neither estate can be economically mined by itself.

We understand that the state of Colorado has issued leases for the state-owned coal in the wildlife federal mineral concern areas. However, we have had no contact from either industry or the state implying that these state leases are not minable without surface minable federal coal resources. See response to comment number 152-05.

- 154-17 See response to comment 141-12.

- 154-18 Of the nine townships identified in the comment recognizing wildlife areas on private surface, only two contain designations for wildlife protection: T. 8 N., R. 90 W. and R. 91 W. Federal minerals are the primary resource we are managing in these areas. The impacts to wildlife in these two townships from federal mineral development were identified as a special concern, and these impacts may be mitigated through BLM leasing or permitting actions related to the federal mineral estate. The surface owner is responsible for protecting owner interests, needs, and rights when negotiating surface use by federal mineral lessees, claimants, or operators. However, if the surface owner and federal coal mineral lessee fail to reach an agreement on the use of the surface, a qualified surface owner can refuse consent to develop surface minable federal coal. BLM requires proof of surface owner consent prior to a coal leasing action. Surface owners involved with other federal minerals and nonqualified surface owners involved with federal coal can be compensated for damages, as provided for under the specific homestead acts that apply.

- 154-19 The requirement for surface owner consent in the Surface Mining Control and Reclamation Act (SMCRA) applies only to coal proposed for development by methods other than underground mining techniques and only to qualified surface owners as defined in 43 CFR 3400.0-5 (gg).

This does not establish or make the federal mineral estate subservient to surface uses. Legal precedence has been established that asserts the mineral estate

is dominant, the surface estate is subservient. Paragraph (g) of Section 714 of SMCRA emphasizes the effect of the "Surface Owner Protection" section is to have on property rights: "nothing in this section shall be construed as increasing or diminishing any property rights by the United States or by any other landowner."

We believe the intent of SMCRA was to be a good neighbor to established (qualified) surface owners in light of the fact that there is sufficient federal coal reserves to develop without developing surface mines that could remove established surface owners that are unwilling to relocate.

Further, the 3500 regulations, addressing leasing of solid minerals other than coal and oil shale, state, in reference to surface owners other than the United States, "where such party opposes the issuance of the permit or lease, the facts submitted in support must be carefully considered and each case separately decided on its merits. However, such opposition affords no legal basis or authority to refuse to issue the permit or lease for the reserved minerals in the lands;...."

It is the choice of the United States to offer mineral resources reserved to the United States for development or refrain from development of federal resources. The regulations based on SMCRA in no way imply that if qualified surface owner consent is given, the United States is bound to issue a lease for development of federal coal resources.

- 154-20 Please see response to comment 141-07.

- 154-21 The Colorado Division of Wildlife has the responsibility to manage wildlife populations within the limits or capabilities of the habitat. Collecting wildlife population information is done by state wildlife agencies and made available to BLM. Establishing carrying capacities for wildlife and livestock will be done through monitoring the vegetation resource along with monitoring animal numbers.

- 154-22 The 1978 and 1979 inventory conducted on Douglas Mountain is reflected in the current livestock allocations. This same area was not inventoried in the recent ecological site inventory; therefore, comparison data are not available. We do recognize the limitations of a one-point-in-time inventory, especially when collected under unusual situations. However, to remain consistent in our procedures, we will use existing preference (which does reflect the inventory in question) until adequate monitoring data are available. If future

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monitoring studies indicate the availability of increased livestock AUMs, then appropriate adjustments could be made.

- 154-23 The Soil Conservation Service (SCS) stocking rate guides are very valuable as a consistent planning guide for indicating possible potentials as well as current production. We do recognize, however, that for individual allotment assessments, these guides are not specific enough for allocation purposes without a supplemental monitoring program. We also recognize that the stocking rate guide cannot be used for improved pastures, where production quite often matches or exceeds native potential but is rated in the low seral stage. For analysis of production levels, these improved pastures were rated according to their actual forage production.

Big sage use was considered as forage in our analysis of the inventory, and our production figures were partially used by SCS in its development of stocking rate guides, especially on winter range.

Fortunately, in this resource area, annuals such as cheatgrass are not a widespread problem. There are only one or two allotments in the resource area where cheatgrass comprises more than 10 percent of annual production. Although we do recognize the value of annuals as early spring forage, we consider cheatgrass as an undesirable invader. Therefore, allotment management plan and habitat management plan objectives will be to reduce the frequency of these plants.

We are not using cheatgrass production in the short-term allocations, primarily because those figures are estimates of what our preference may be following analysis of monitoring studies. If these studies are favorably influenced by the degree of use of annuals, then adjustments will be made accordingly.

- 154-24 These typographic and typesetting errors have been corrected in the final. As suggested, the table has been revised to combine specific examples of generic situations. References to Appendix 11 should identify the size and type of treatment indicated.

- 154-25 Wild-horse use, along with many other uses, was determined to be a compatible use with the management priority areas delineated for the Sand Wash area (livestock and soils/water), although some concerns may be placed on wild horse management to prevent conflicts with the priority uses. See the definitions of compatible and

excluded uses for livestock and soils/water management priority areas. Also see the response to comment 154-02.

- 154-26 BLM considers wild horses to be a viable part of the natural environment in the western United States.

- 154-27 T. 10 and 11 N., R. 96 W., are predominately management priority areas (MPAs) for wildlife, water/soil, livestock, and a research natural area (RNA) under the Natural Environment Alternative. There is also a small oil and gas priority area in the northwest corner of T. 11 N., R. 96 W.; that area is also an oil and gas priority area under the Preferred Alternative. The FMCA (2) in the Preferred Alternative overlies what were water/soil and wildlife MPAs and part of the RNA in the Natural Environment Alternative.

- 154-28 Although livestock and minerals were the favored commodity uses under the Commodity Production Alternative, other commodity uses such as hunting and other forms of recreation were also emphasized in that alternative. The wildlife priority area in T. 11 and 12 N., R. 102 and 103 W., is within the Colorado Division of Wildlife's Cold Spring quality elk management area. A wildlife priority designation would provide opportunities to manage for big-game habitat, while still allowing other commodity uses, such as livestock grazing and minerals development, to occur. For the Preferred Alternative, BLM management determined, after reviewing all other alternatives, that oil and gas leasing and development was the preferred management priority for the area. T. 9 N., R. 95 W. is delineated as livestock and oil and gas management priority areas in the Commodity Production Alternative and as livestock, oil and gas, and wildlife management priority areas in the Preferred Alternative.

- 154-29 After reviewing all other alternatives, BLM management determined that oil and gas leasing and development was the preferred management priority for the area. Livestock grazing and management would be a compatible use within an oil and gas priority area.

- 154-30 Under the Current Management, Energy and Minerals, and Commodity Production alternatives, no mention of fragile soil and water areas was made, because no special stipulations are being proposed for those areas. The "areas covered" refer to soil and watershed areas.

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Under the Renewable Resource, Natural Environment, and Preferred alternatives, we are proposing special stipulations within identified fragile soil and water areas. These areas and the particular stipulations are identified under the Renewable Resource Alternative on page 2-47 and on page 2-56 under the Natural Environment Alternative. On the Renewable Resource and Natural Environment Management Priority Area maps, the fragile areas are within the delineated soil and watershed areas. They were not treated as a separate management priority area.

The acreages for fragile areas under the Preferred Alternative are listed in Table 2-29 on page 2-63. These acreages will be added to the text under Issues 2-5 and 2-6 on page 2-65.

154-31 Descriptions of the kinds of resource values included in management priority areas for oil and gas and for livestock grazing were misleading. In the early stages of plan development, each resource ranked the entire resource area for its own use or protection needs. This usually resulted in two or more levels of priority over the resource area for each use or resource. For example, livestock grazing allotments were classified into three levels: first priority - I (Improvement) category, second priority - M (Maintenance) category, and third priority - C (Custodial) category. Most management priority areas are chosen from the highest priority for each resource or use. However, where no other resource shows a higher priority, and it is consistent with the goals of that alternative, a lower priority for a particular resource would be chosen.

154-32 These typographic and typesetting errors have been corrected in the final. As stated in the introduction to Appendix 11, the displayed AUM figures are for vegetative manipulations only. AUMs derived from structural projects were combined with benefits from intensive management systems for the expected long-term allocations in Appendix 12. The expected benefits derived from intensive management systems were predicted as a function of the allotments overall livestock forage potential.

154-33 See response to comment 154-06.

154-34 After reviewing the draft RMP/EIS and all public comments, BLM believes that the draft meets the requirements of both the National Environmental Policy Act and the Federal Land Policy and Management Act.

154-35 We have reviewed all allotments listed in Appendices 6, 8, 11, 12, and 16 to ensure that identified problems were consistent with management's proposed action. Appendix 9 was the focal point and basically summarized the various problems and proposed management actions that were analyzed in various appendices and the RMP narrative. This appendix has been modified to provide a more concise explanation of problems and possible solutions. Additional data has been added to provide a more complete description of management concerns and proposed solutions. Errors that were discovered have been corrected and are included in the Errata or Text Change sections of this document. These changes did not result in any changes in impact analysis, but they did more completely describe those situations analyzed in this document.

154-36 Management priority areas in this plan are used to make broad decisions for management of federal lands under the jurisdiction of BLM in the Little Snake Resource Area. See the description of management priority areas in the proposed plan section.

154-37 Reproducing and printing a landownership map at a comprehensible scale was determined to be prohibitively expensive.

154-38 As stated in the proposed plan, under Management Priority Areas, the management prescriptions only apply to federally owned surface and/or minerals under BLM jurisdiction. It is not possible to show this on the alternatives maps because of the scale.

155-01 See response to comment 2-01.

155-02 Limestone Ridge was inventoried for wilderness characteristics but was found not to meet the mandatory criteria for wilderness. It has, however, been recommended as a research natural area.

155-03 See response to comment 113-01.

157-01 See responses to letter 154.

158-01 When analyzing the impacts from the various activities proposed under all the alternatives, BLM utilized a worst-case-analysis approach. The statements cited in comment 158-01 are what could happen under a worst-case scenario.

When reviewing site-specific activities, BLM will consider and uphold state water quality standards, as noted on page 2-15, Items 1 and 2. BLM demonstrates that these standards will be upheld through statements on pages 2-65 and 2-66, Items 1, 2, 3, 4, and 5.



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- A summary evaluation and location of waters that have quality problems are listed and described in Chapter 3 on page 3-52 and in Appendix 23. The inventory will be started in 1987 if funding is available.
- 158-02 The text has been changed.
- 158-03 The actions were meant to be part of the Preferred Alternative. Changes have been made in the text.
- 158-04 Text changed to more accurately reflect the desired meaning.
- 158-05 Only terrestrial species were considered under Unsuitability Criterion 15, because fish habitat and populations are very limited within the coal planning area and impacts from mining would be insignificant. Also see response to comment 158-08.
- 158-06 It is the responsibility of the state to identify National Resource Waters during consultation and application of this criterion. BLM or the applicable surface management agency will review these lands to determine if the exception or exemptions apply.
- The Colorado Department of Natural Resources and Department of Health were consulted again as a result of this comment, and they did not identify any lands containing National Resource Waters.
- The Department of Health designates High Quality Waters and classifies them as Class I or Class II. All Class I High Quality Waters are outside the federal coal planning area. Therefore, even if the criteria is similar between High Quality Waters and National Resource Waters, none would be included in the application of unsuitability since they are outside the coal planning area. A change was made in the narrative on page A2-22.
- 158-07 Changes were made to the analysis section under criterion 19 to clarify this issue. See text changes for pages A2-22 and A2-23 in the Draft Little Snake RMP/EIS.
- 158-08 Impacts to aquatic resources would not occur since BLM would ensure that significant impacts to water quality would not occur, as required by the Clean Water Act. A statement has been added to Chapter 2 under Management Guidance Common to All Alternatives, Resource Specific Guidance, Wildlife Habitat (Issue 2-2) to emphasize BLM's commitment to protection of aquatic habitat.
- 158-09 BLM's definition is stated as follows (from BLM Manual 7240):
- "Federal, State, and/or local water quality standards (whichever are most stringent) shall be used as indicators of adverse water quality impacts. Water quality will be considered as adversely impacted when one of the following conditions exists:
- Identified beneficial uses on or offsite are adversely impacted, compared to pre-activity levels.
  - Existing water quality levels fail to meet applicable standards."
- For mining activities specifically, BLM can propose mitigative measures in order to protect undue degradation of water quality. BLM's authority in mining situations is outlined in the Code of Federal Regulations 43, Subpart 3809.0-3.
- 158-10 Text has been changed accordingly.
- 158-11 BLM is in the process of developing policy guidance for salinity control project locations at the state office level. This guidance will be available in July 1987. At this time, BLM has cited problem areas that would benefit from watershed projects, and BLM's efforts will be directed to these areas. Requirements of the Clean Water Act and the Colorado River Basin Salinity Control Act will certainly be taken into consideration at the time the specific activity plan is written.
- The scheduling depends on available funding.
- See pages 2-64 through 2-66 under the Preferred Alternative, Soil and Water Management Actions. Also see page 2-15, Resource Management Alternatives, Soils and Water Resources.
- 158-12 See text change for page 2-66.
- See text change for page 2-15, Soils and Water Resources, item 1.
- 158-13 This discussion is dependent on site-specific parameters, which will be covered at the mine plan stage.
- This type of "assurance" would also take place at the mine plan stage.
- 158-14 Presently, BLM is developing a general monitoring plan for the Little Snake Resource Area that encompasses all renewable resources. Most of the ideas listed in comment 158-14 will be included in that plan.

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- 158-15 Because of the small amount of these habitat types within the resource area, we concluded that significant regional impacts would not occur and that any localized impacts would be analyzed on a case-by-case basis. The summary table is designed to include impacts important to making a decision between alternatives.
- 158-16 Specific management standards and objectives and specific commitments for improvement of riparian areas will take place during development of specific management plans (e.g., wildlife, livestock, watershed). The timing and development of these plans will depend on funding and manpower.
- The proposed plan has been revised to reflect more commitment to completing habitat management plans for riparian habitats.
- The Little Snake Resource Area does not presently have any riparian demonstration areas; however, as improvement projects on the Little Snake River are completed, they will serve to demonstrate the effectiveness of proper riparian management.
- Regarding the meaning of protection of "satisfactory condition," the text has been revised to clarify the meaning of item 2c, page 1-7.
- The guidelines for forage utilization rates, streambank protection, etc., would be different for each riparian management plan and therefore would be established during development of specific management plans.
- 158-17 Restrictions to livestock grazing in riparian areas will be determined on a case-by-case basis as riparian inventories are completed. This will include a determination of the need for fencing.
- 158-18 "Wetlands" will be added to item 3 under Wildlife Habitat (Issue 2-2) on page 2-14. In reference to compliance with Executive Order 11990, please see page 2-2, item 1. In addition, during analysis of site-specific actions, all applicable regulations, including executive orders, will be considered. Commitments to wetland inventories have been added to the proposed plan.
- 158-19 This information is not appropriate to a general area-wide planning document. Numerous and varied coordination processes would be required to implement individual resource projects stemming from the broad RMP decisions. BLM will comply with all applicable coordination requirements during the analysis, development, and implementation of each site-specific project.
- 158-20 Federal mineral concern areas (FMCAs) are private surface with federally owned subsurface; therefore, BLM has no surface management authority. BLM's only commitment to surface resources is to recommend measures for mitigation of impacts of federal mineral development.
- 158-21 The site-specific impacts of destruction or depletion of wells and springs on wetlands and streams would be assessed and mitigative measures developed during specific mine plan analysis.
- Because of the concern, however, a general discussion of wetlands has been added to the RMP.
- 158-22 The most important areas were determined through analysis of bald eagle wintering distribution maps supplied by the Colorado Division of Wildlife. Data to prepare the maps were supplied by the U.S. Fish and Wildlife Service.
- 158-23 The specific steps to ensure compliance with Executive Order 11988 would depend on the proposed activity and how it might affect the floodplain. See change in item 5, page 2-66.
- 158-24 Through impact analysis of the various alternatives, the sensitivity of other resources and land uses to oil and gas leasing and development was evaluated in the draft RMP/EIS. With the exception of the proposed Diamond Breaks Wilderness Area, impacts to critical, sensitive, or fragile resources can be adequately mitigated through no-surface-occupancy stipulations, performance standards, or other prescriptions that will still potentially allow oil and gas leasing and development. We believe impacts to other resources will not be more adverse to lands available for leasing with no-surface-occupancy stipulations than to lands closed to leasing.
- BLM's policy of not leasing versus leasing with mitigative stipulations is guided by the Interior Board of Land Appeals (IBLA) decision "Robert G. Lynn (76 IBLA 383)." See BLM Washington Office Instruction Memorandum No. 84-254, No. 84-254, Change 1, and No. 84-254, Change 2 (see Appendix 27).
- 158-25 BLM cannot apply a no-surface-occupancy stipulation to an existing oil and gas lease, if it was not originally leased with this stipulation attached. BLM can require adherence to performance standards or special mitigative measures on existing lands. New leases would contain wording to the effect that no surface occupancy would be allowed if the performance standards could not be met.

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- 158-26 Cumulative impacts will be addressed within the Little Snake oil and gas activity plan and within the site-specific activity plan for coal development. Within the coal planning area, a USGS hydrologic model (Parker and Norris 1983) will be utilized to assess cumulative impacts to surface waters. A cumulative assessment will also be made in oil and gas areas by utilizing various Soil Conservation Service methods for hydrologic analysis.
- 158-27 General stipulations for water resource protection are outlined in the Oil and Gas Umbrella EA. Specific stipulations are developed case by case and attached to Applications for Permit to Drill, Notice of Stakings, Sundry Notices, etc. See response to comment 153-05.
- 158-28 BLM believes the current level of detail outlined on page 2-66 is appropriate for the RMP.  
See changes in text on page 2-66.
- 158-29 Areas along the Little Snake River were considered for inclusion as fragile soil and water areas under the Renewable Resource and Natural Environment alternatives. These were dropped under the Preferred Alternative, mainly because the fragile areas were more scattered and BLM believed that they could be protected under stipulations listed in Item 2, page 2-65.  
  
Some of the areas along Powder Wash did not meet the stringent criteria discussed in Appendix 23 for fragile soil areas. The other areas would be protected under Item 2, page 2-65.  
  
The areas along Milk Creek are mostly privately owned, and BLM has no surface jurisdiction on those lands.
- 158-30 Location of future coal lease tracts and associated mines would more appropriately be determined during activity planning, when more detailed information would be available concerning availability and quality of mineable coal in specific areas, types of mines proposed, and potential site-specific impacts to other resources. Also see response to comment 98-28.
- 158-31 As noted on page 2-13 of the Draft RMP/EIS (Coal [Issue 1-1]), "Site-specific activity planning including environmental analysis, would be needed for leasing specific tracts." The RMP decision on coal is to determine what lands are available for further consideration for leasing, using the coal screens identified on page 2-13 of the Draft RMP/EIS. If tracts are subsequently identified for potential leasing, BLM will prepare environmental assessments or environmental impact statements, as appropriate, to meet the requirements of both NEPA and the federal coal leasing program.
- 158-32 Determination of thresholds within the Little Snake Resource Area would depend on site-specific information about locations of proposed lease tracts and types of proposed mines and their relationship to surface and groundwater resources to determine whether a potentially significant impact to water quality would occur. Coal activity planning will include analysis of both site-specific and cumulative impacts to water quality as the result of leasing and development of specific coal tracts, as well as the adequacy of potential mitigation. Thresholds will be considered, if appropriate and if data are adequate to determine significant irreversible or irretrievable impacts to water quality. That information and analysis would be used by the decision maker to determine whether particular coal tracts are appropriate for leasing.
- 158-33 We concur and have added a paragraph to Cumulative Analysis, page 4-4. The information presented in Chapter 3 (Affected Environment), though limited, represents the best information currently available. Site-specific data and assumptions are necessary to attempt any quality impact assessments.  
  
Where applicable, site-specific impact assessments will be performed using appropriate state-of-the-art modeling techniques. Specific assumptions and methodologies are based on site-specific conditions, using modeling guidance provided by regulatory agencies. As stated in the draft EIS (page 4-1) ".... all applicable federal, state, and local laws and regulations are considered part of management actions proposed under all alternatives." This includes air quality regulations.
- 158-34 References to satisfactory and unsatisfactory livestock forage have been inserted in the Glossary, along with expanded definitions under Livestock Forage Condition. Since many people have confused unsatisfactory forage condition with low seral stage, we have included additional narrative to clear up this misunderstanding (see the Text Changes section).
- 158-35 Although the accumulated impacts of the proposed range improvement practices are expected to change the net overall seral stage status by 5 percent, there are actually seral stage changes occurring in all stages. In many cases, vegetative composition can be changed without altering its seral stage.

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- In view of large amounts of acreage affected by these range practices, the impacts are considered significant. See pages 4-33, 4-34, 4-39, and 4-40 of the draft for a discussion of impacts to soils and water resources.
- 158-36 Appendix 9 has been modified to strengthen the connection between identified problems and proposed solutions.
- Appendix 7 has also been expanded to provide additional information about those resource conflicts that were considered part of the categorization process.
- 158-37 BLM will not wait for the results of long-term monitoring to institute management. A list of allotments by priority for management will be in the rangeland program summary supplement to the record of decision. Some improvement on riparian areas is currently being done.
- Additional narrative has been included in Appendix 7 that discusses the ranking of allotments for range improvement expenditures.
- 158-38 The clause "increased grazing would also adversely impact naturalness" should be deleted because no grazing increase is anticipated. Under the Preferred Alternative, these areas would not be designated as wilderness; therefore, beneficial range projects and intensive management systems could be developed.
- If wilderness designation occurred and livestock damage were evident, appropriate grazing management systems would be developed on a site-specific basis to protect water resources and preserve the wilderness characteristics.
- 158-39 A monitoring plan will be part of the rangeland program summary (RPS) supplement to the record of decision. Schedules and progress toward monitoring will be in future RPS updates.
- 158-40 The summary table is designed to include impacts important to making a decision between alternatives. No significant impact to threatened or endangered animal species would occur under any alternative.
- 158-41 It was our intention to indicate that management actions (the RMP), as well as preparation of the RMP/EIS, would not affect any endangered species. During preparation of particular activity plans, in which specific actions will be accomplished, a determination will be made on the effect of that action on endangered species. See page 1-1 of the draft RMP/EIS.
- 158-42 The RMP leaves the door open for more specific actions designed to conserve endangered species through preparation of habitat management plans. Such specific actions would require the development of activity plans.
- 158-43 Activity plans, site-specific-project plans, and other actions taken under the RMP will require a wide range of public participation, interagency coordination, and environmental analysis. The level of environmental analysis will be appropriate for potential impacts and will follow NEPA and other applicable laws. The process and opportunity for public involvement will be determined at the time such actions are considered and will vary from the intensive processes that will occur with regional coal leasing EISs to categorical exclusions.
- 158-44 Currently, BLM State Office personnel are involved in interagency meetings concerned with nonpoint source pollution; in particular, BLM is involved in the Colorado River Basin Salinity Control Advisory Council. BLM will continue to pursue interagency meetings concerning water quality improvements.
- The RMP has identified general procedures by which BLM will comply with water quality problems within the resource area (Items 1-9, page 2-15 and Items 1-10 on pages 2-64, 2-65, 2-66.) Site-specific water quality problems will be handled at the activity plan stage.
- 158-45 The process for handling and documenting categorical exclusions was published in the *Federal Register* for public comment before it was included in The Department of Interior Manual, Part 516 DM6 Appendix 5 (BLM). Since this process is governed by the Department of Interior Manual and is not affected by this RMP, it is not appropriate to repeat here.
- 160-01 See response to comment 2-01.
- 161-01 Individual activity plans will describe the protective measures for each project within each special management area. Site-specific plans are activity planning and will be developed after the RMP is selected and the Record of Decision is signed. See page 2-2, item 6 in the draft.
- 161-02 See response to comment 2-01.
- 161-03 The lack of proposals (concrete or otherwise) requires that flexibility be maintained. Right-of-way development is restricted or excluded in management priority areas where significant impacts might otherwise occur. Additionally, the high percentage of private land in the resource area would preclude the designation of corridors

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in the eastern two-thirds of the resource area and generally guide placement of rights-of-way in the western one-third of the resource area.

161-04 See response to comment 113-01.

162-01 See response to comment 2-01.

163-01 See response to comment 2-01.

163-02 Specific, potential air quality impacts because of oil and gas exploration and development is no more certain than stated in the Draft RMP/EIS for coal development (page 4-4): "Specific impacts could not be predicted until detailed development plans were prepared, and atmospheric dispersion modeling assumptions were specified." Refined analyses cannot be attempted until specific development is proposed.

Regardless, the draft RMP/EIS also clearly states (page 4-1) "... all applicable federal, state and local laws and regulations are considered part of management actions proposed under all alternatives." This includes Prevention of Significant Deterioration Class I and II increments, as well as Colorado Category I and II increments.

The comparison to gas development in North Dakota, while interesting, is inappropriate because of the vast differences in anticipated oil and gas development and particularly the differences in hydrogen sulfide concentrations in the fields. Obviously, any major emitting facility (such as a gas sweetening plant) would be required to prepare detailed air quality impact analyses before construction is permitted.

163-03 BLM believes that most of the impacts from timber harvesting and road building would not greatly affect the Green and Yampa rivers. Impacts primarily would be on local streams outside the monument. See text changes.

163-04 The RMP proposes to allow specific actions that could impact the Dinosaur National Monument. Before BLM permits or undertakes any action under the management prescriptions of the proposed plan, any such action that could impact Dinosaur National Monument would be analyzed in an environmental impact statement or environmental assessment. An example would be the oil and gas activity plan that will be completed after the final RMP/EIS.

163-05 We did not directly reserve AUMs for wildlife because of lack of adequate data to determine exact figures. However, by indicating numbers of animals for which we would provide forage, we are, in essence, reserving forage without specifying

numbers of AUMs or the location. After monitoring, which will be done in every allotment, we will be able to determine the appropriate number of AUMs that need to be reserved for wildlife as well as livestock.

163-06 The use estimates discussed on page 64 of Chapter 3 pertain to public lands only; and those figures contained in Appendix 19 are area-wide figures for all lands, regardless of surface status. The area-wide figures were obtained from Bureau of Outdoor Recreation data.

163-07 Site-specific planning will address potential activities that may affect national natural landmarks (NNL). At this time, no activities are foreseen that may impact NNLs.

163-08 The text has been revised.

163-09 See response to comment 2-01.

163-10 We believe that a VRM Class I designation would be too restrictive for the priority areas identified for the Dinosaur National Monument adjacent wilderness study areas and West Cold Spring WSA. VRM Class II management of the nonsuitable areas will allow for protection of the visual resources, while allowing for certain levels of development to occur.

163-11 When the alternatives were put together, Calico Draw RNA was considered in the Natural Environment and Energy and Minerals alternatives. It was considered in the Natural Environment Alternative since that was the alternative of maximum protection. The Energy and Minerals Alternative showed no significant minerals development potential in the RNA; therefore, it was considered in that alternative as well. The remaining alternatives showed overriding resource values for the area under those specific alternatives.

It should also be noted that the BLM Geologic Advisory Group in their recent publication "Faults, Fossils, and Canyons" (February 1986) recommended against special management designation for Calico Draw.

164-01 BLM policy is that decisions adjusting allowable levels of livestock grazing not be based solely on a one-point-in-time inventory. Monitoring data must show that adjustments are necessary and justified. This includes both permanent increases or decreases in grazing use. BLM policy also states that decisions be issued or agreements entered into within 5 years of the publication of a rangeland program summary (RPS), following completion of a land-use plan (LUP) and grazing EIS.

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The RPS is the principal instrument for communicating to users and the general public the results of BLM's LUP/EIS analysis process. RPSs should identify rangeland management objectives, describe actions that will be taken to achieve those objectives, and identify priorities by allotment for management action. For example, all Improve (I) category allotments normally have the highest priority for monitoring, preparation of allotment management plans (AMPs), and installation of improvements. Budget constraints, however, require that I allotments be ranked to assure the AMPs are prepared and improvements installed in priority order. This will allow users, the public, and BLM management to track progress being made toward plan implementation.

Monitoring priority should be stated in the RPS or its update in terms of the intensity of monitoring that is needed and feasible. BLM policy states that all allotments be monitored; however, not all at the same intensity. A monitoring strategy must be developed that will assure monitoring will be initiated at the intensity and frequency needed to establish proper levels of livestock use, consistent with the management direction identified in the LUP. Ecological site inventories provide a baseline for monitoring where they exist.

164-02 Range-site potentials are used as received from the Soil Conservation Service. This was used in the analysis of our ecological site inventory for potentials and approximate stocking rates.

164-03 Appendix 14 gives a summary of the monitoring methods we will be using. Detailed analysis will be provided in the RPS. See response 164-01.

164-04 The 3,258,000 acres you refer to are those acres on which the federal government has mineral ownership. The correct figure for authorized grazing or federal surface should be 1,256,540 (see page 3-41).

Categorization criteria are presented in Appendix 7, as modified in this final. Specific allotment worksheets are on file in the resource area. Allotment categorizations are not fixed and will change as new data and resource conflicts are analyzed. The rangeland management program summary and updates will keep the public informed of these changes.

164-05 Adjustments in livestock use are in accordance with current BLM regulations and policies (see response to comment 164-1).

The projected 46 percent decline is a projection of what could happen if full preference is used. Currently, operators are voluntarily taking an average 37 percent nonuse, which has prevented much of the deterioration from occurring.

164-06 BLM has the authority to make use adjustments or restrict livestock grazing immediately when it is determined that such adjustments are required to sustain resource productivity and protect the resource from substantial and long-term damage. We plan to exercise that authority where conditions are warranted (see BLM Manual H-4110-1.33).

164-07 See Table 3-9, which states that the unmapped portion of the BLM surface land is 412,299 acres.

In reference to the priority list, please see comment 147-02.

164-08 Allotment maps are supplied in this final RMP. It is true that the RMP does not promise any specific measures will be taken by any particular date or on any specific area. All of these actions are to some extent hypothetical and dependent on funding. The RMP explains that BLM will prepare site-specific analysis of actions eventually required under the RMP and subsequent activity plans (allotment management plans). "... because the scope of the EIS is determined by the scope of the proposed action, it is unreasonable to expect the EIS to analyze possible actions in greater detail than is possible given the tentative nature of the MFP itself" (or RMP in this case). See the decision of the U.S. District Court, Nevada *NRDC, Inc., et al., vs Hodel* concerning the Reno Grazing EIS and Land Use Plan. The development of allotment management plans and the associated projects will contain allotment-specific objectives and benefit/cost analysis on proposed projects.

164-09 Species diversity and richness, relative abundance, and other components of nongame species populations will be used to monitor the condition and trend of wetlands and riparian habitats, as well as other high-value habitats that may be affected by future management actions.

We did not provide acreages of priority areas for comparison, because relative sizes of these areas can be determined from the maps in the draft RMP.

We do not fully understand your comment: "No figures comparable to grazing allotment figures are given to determine habitat condition." Based on our interpretation of this comment, we do not have figures on any aspect of habitat condition.

## RESPONSES TO COMMENTS

This type of information will be obtained from the monitoring program.

Inventory of habitat types and habitat condition, development of standards for implementing habitat improvement, and criteria for judging wildlife habitat and population variables will all be accomplished through both the monitoring program and development of habitat management plans.

164-10 Specific management and protection will be part of individual activity plans, such as HMPs or site-specific environmental assessments, and may include such management as listed on page 2-14, Wildlife Habitat (Issue 2-2).

164-11 The draft RMP does not attempt to state any specific percentage of climax vegetation as a primary allotment objective. Objections have to be measurable to be meaningful, and the hypothetical "climax" ecological state cannot be specifically measured or proven. The 3 percent climax referred to in Appendix 6 is a indication of present conditions, not objectives.

164-12 See comment 98-13 in relation to impacts of chemical treatments.

Narrative changes have been made on page 4-14 (see text changes) that discuss the impacts of sagebrush manipulation, of which chemical control is an important technique.

165-01 The boundary adjustment you refer to is proposed under the Preferred Alternative and the proposed plan specifically to exclude portions of the lease area where cultivation has or can take place, making the boundary more easily identifiable on the ground.

166-01 See response to comment 2-01.

166-02 See response to comment 3-11.

167-01 A detailed discussion of multi-mineral development is beyond the scope of the land-use plan, since it is more a matter of the Mineral Leasing Act and its subsequent amendments and regulations.

BLM is committed to multi-mineral development, as outlined in 43 CFR 3000.7. The issuance of a mineral lease does not confer to the lessee an exclusive right to the use of the lands, but rather, only to the development of the particular mineral for which the lease was issued. The coal lease form states that the lessor (the United States) reserves the right to authorize other uses for the lease lands, specifically, leases for other minerals, permits, easements, and rights-of-way. The lease

form also states that the lessor shall condition such authorizations to prevent unnecessary or unreasonable interference with the rights of the lessee as may be consistent with concepts of multiple-mineral development. For examples of this clause, see the 1958 coal lease form, section 4; the 1977 coal lease form, section 3; and the 1984 lease form, section 7.

We do not think the potential lessee's good faith is violated since it is stated in the lease form, and any existing encumbrances and leases for other minerals are a matter of public record through BLM's master title plats, OG plats, and coal plats, as well as county and state records.

Concerning the last statement in the comment, Colorado Mined Land Reclamation Division (CMLRD) must consider prior rights when dealing with conflicts between mineral leases and realty actions. It is not CMLRD's responsibility to settle differences arising from BLM's leasing regulations concerning multiple-mineral development.

167-02 This paragraph states that critical habitats "would be protected by limits or restriction..." but does not say that critical habitats will not be mined. In addition, all critical habitats will receive some sort of protection from mining impacts.

167-03 Change made, please see Errata for page 2-7.

167-04 We believe that these concerns can better be analyzed on a case-by-case basis during analyses of specific activity plans.

167-05 We realize that scattered tracts of prime farmland exist within Moffat County, but until we know where the mining will occur, we cannot study the impacts of the activity on prime farmlands. This will be covered on a site-specific basis at the activity plan stage.

Because they are not part of BLM's unsuitability criteria, prime farmlands are not given the same attention as floodplains and alluvial valley floors in the RMP.

167-06 We agree. A paragraph will be added to reflect such impacts.

167-07 See response to comment 167-4.

168-01 See response to comment 2-01.

168-02 There would be no significant impacts to the potential Wild and Scenic River eligibility of the Yampa River within Dinosaur National Monument under any alternative analyzed in the RMP/EIS. Also see response to comment 3-11.

## RESPONSES TO COMMENTS

- 168-03 Cold Spring Mountain, the Dinosaur Adjacent units, and Limestone Ridge were inventoried in 1979 for wilderness characteristics. The decision to remove Limestone Ridge from further wilderness consideration was made in November 1980. This decision is detailed in the Intensive Wilderness Inventory, Final Wilderness Study Areas, available at the Craig District and Colorado State offices. Wilderness criteria and decision rationale for the Dinosaur Adjacent units and West Cold Spring are addressed in the Summary Analysis and Recommendations Table starting on page 5-2 of the Wilderness Technical Supplement.
- 169-01 See response to comment 100-01.
- 170-01 See response to comment 2-01.
- 170-02 See response to comment 147-4.
- 171-01 See response to comment 2-01.
- 172-01 See response to comment 2-01.
- 174-01 See response to comment 147-4.
- 175-01 See response to comment 2-01.
- 176-01 See response to comment 2-01.
- 177-01 See response to comment 2-01.
- 178-01 See response to comment 2-01.
- 179-01 See response to comment 154-14.
- 180-01 See response to comment 2-01.
- 180-02 BLM is governed by adequate laws and regulations that offer protection to all wildlife, including threatened or endangered species, whether or not they occur in wilderness areas.
- 180-03 See response to comment 2-01. Existing regulations, mitigative stipulations and monitoring will ensure protection for the values identified.
- 180-04 Even though outside sights and sounds are noticeable within portions of the WSA, the WSA as a whole contains sufficient opportunities for isolation and primitive, unconfined recreation necessary to be considered natural (see Analysis and Recommendation S-5 Wilderness Technical Supplement).
- 180-05 BLM considered this aspect. Also see response to comment 2-01.
- 180-06 The other areas being recommended include most of Dinosaur National Monument and various other U.S. Forest Service and BLM WSAs, as well as Diamond Breaks.
- 180-07 See response to comment 3-11.
- 181-01 Page A15-3 addresses the severe impacts that would occur on the resource area under the no grazing alternative. There would be a 57 percent decline (\$5,400,000) in gross livestock revenue and the loss of 102.7 man years in the labor force.
- 181-02 See response to comment 154-14.
- 181-03 Forage deterioration can result from overutilization by livestock and/or wildlife. In the draft RMP we discussed problems related to livestock, but we also presented problems related to big game. On page 4-19, 2nd paragraph under Issue 2-2: Wildlife, problems with elk were discussed. Table A16-1, page A16-1, also points out specific allotments where wildlife may be the primary cause of forage deterioration. Also see responses to comments 154-6 and 154-33.
- 182-01 See response to comment 2-01.
- 183-01 See response to comment 2-01.
- 183-02 Discussion of actual use (5-year average) in relation to existing preference is discussed on page 3-42.
- 183-03 Please see response to comment 115-05.
- 183-04 Please see response to comment 115-06.
- 183-05 Please see response to comment 164-01.
- 183-06 We believe that discussions of the details of actual plan implementation fall outside of the scope of the draft RMP document. Finalization of the details of plan implementation will occur during the implementation phase of the RMP.
- 183-07 BLM's assumption for increased recreation-visitor days was based on recreation coefficients from the Bureau of Outdoor Recreation. These coefficients are based on increases in regional population and the associated increases in demand for all categories of recreation.
- We considered the total supply of semiprimitive and primitive recreation in Northwestern Colorado and other recreational settings and the shifting of 297,000 acres from primitive to semiprimitive. We concluded that supply would meet the demand under any of the alternatives proposed. Therefore, the amount of recreational use in the resource area would not be affected by any of the alternatives considered.
- 183-08 Because of manpower and funding limitations, we have not been able to collect enough data to provide a detailed picture of ORV demand in the resource area. ORV activities occurring within the resource area will be monitored on a regular basis in order to ensure that any adverse



## RESPONSES TO COMMENTS

- impacts caused by ORV use can be minimized and mitigated in an acceptable manner. Also see response to comment 131-01.
- 183-09 See response to comment 58-2.
- 183-10 Avoidance stipulations would be imposed under all alternatives to protect identified Colorado BLM sensitive plant species whenever they occur within the resource area. See page 2-15, Issue 2-3, of the draft RMP/EIS. This mitigation has also been included in the proposed plan (see Proposed Resource Management Plan, Management Actions, Threatened/Endangered, Candidate, and Sensitive Plants [Issue 2-3], Item 2). Table 3 in the proposed Resource Management Plan includes this mitigation.
- 183-11 You are correct. Reference to verbal agreements regarding monitoring studies and exclosures on the sites was inadvertently omitted. BLM is committed to cooperate with the Colorado Department of Natural Resources and the Colorado Natural Areas program in protecting the special biological features identified on these sites.
- 183-12 Please see response to comment 102-4.
- 183-13 BLM has a list of overappropriated streams within the resource area. Because BLM has no plans to use overappropriated streams, any proposed or planned projects or activities will not be affected. Most of the BLM water projects are proposed for intermittent drainageways in the western portion of the resource area, where overappropriation is not a problem.
- 183-14 The references to water development projects cited within the RMP primarily highlight what BLM believes is needed to meet the goals of the livestock, wild horses, or soils and water programs. BLM will consider water availability before any of the projects are approved. This is done on a site-specific basis through an environmental assessment.
- BLM also files appropriate water rights on spring sources and applies for well permits and stock pond construction permits as a matter of practice.
- 183-15 The implied right of condemnation under the Colorado Constitution has no validity on federal lands. BLM will comply with the conditions outlined under Sections 504 and 505 of the Federal Land Policy and Management Act of 1976 before any rights-of-way are granted across public lands.
- 183-16 It is not possible to develop a "timetable" for the development of cultural resource management plans (CRMPs). These plans are based on issue-initiated actions, with consideration of BLM funding or manpower. Currently, there is no way of knowing what CRMPs will be required or when they will be needed. As stated in Chapter 2, page 2-18, and other areas of the RMP, these plans will be developed and used on a case-by-case basis.
- 183-17 The comment regarding page 4-86 appears to indicate a misunderstanding on what is going to happen with cultural resources and the open ORV designation. It is BLM's decision not to conduct cultural resource surveys in the open ORV areas. The time, money and manpower to carry out this extensive work is not available. The open areas, as discussed in 43 CFR 8340, are casual use of the resource area. Currently, ORV use in the resource area is very dispersed. The ORV activities (such as competitive events) that are permitted through recreation permits will include cultural resource management actions and mitigations. These will be a condition of that use. Also see response to comment 109-02.
- 183-18 We agree, and we will set it up accordingly in this final.
- 185-01 See response to comment 28-01.
- 186-01 See response to comment 28-01.

## RESPONSES TO COMMENTS

### HEARINGS

- A-01 See response to comment 2-01.
- A-02 See response to comment 147-03.
- A-03 See response to comment 2-01.
- A-04 See response to comment 58-02.
- A-05 See response to comment 2-01.
- A-06 There is no data available to the BLM that would indicate which minerals are present and in what quantities in the resource area. Without this data base, no economic projections can be made. Also, the BLM does not have a data base to support or refute the contention that the U.S. government subsidizes the extractive mineral or livestock grazing industries.
- A-07 See response to comment 2-01.
- A-08 See response to comment 2-01.
- A-09 See response to comment 154-05.
- A-10 See responses to comments 15-3, 98-22, 139-2, 147-2, and 147-03.
- A-11 See response to comment 3-11.
- A-12 See response to comment 2-01.
- A-13 See response to comment 2-01.
- A-14 See response to comment 2-01.
- A-15 See response to comment 2-01.
- A-16 See response to comment 147-4.
- A-17 See response to comment 2-01.
- A-18 See response to comment 2-01.
- A-19 See response to comment 2-01.
- A-20 See response to comment 2-01.
- A-21 See response to comment 2-01.
- A-22 See response to comment 2-01.
- A-23 See response to comment 2-01.
- A-24 See response to comment 2-01.
- A-25 See response to comment 3-11.
- A-26 See response to comment 2-01.
- A-27 See response to comment 2-01.
- A-28 See response to comment 2-01.
- A-29 See response to comment 2-01.
- A-30 See response to comment 2-01.
- A-31 See response to comment 2-01.
- A-32 See response to comment 2-01.
- A-33 See response to comment 2-01.
- A-34 See response to comment 2-01.
- A-35 See response to comment 28-01.
- A-36 See responses to comments 139-01 and 147-4.
- A-37 See response to comment 139-16.
- A-38 See response to comment 2-01.
- A-39 See response to comment 2-01.
- A-40 See response to comment 2-01.
- B-01 See response to comment 2-01.
- B-02 See response to comment 2-01.
- B-03 See response to comment 98-22.
- B-04 See response to comment 2-01.
- B-05 See response to comment 15-03.
- B-06 See responses to comments 158-16 and 158-17.
- B-07 See response to comment 2-01.
- B-08 See response to comment 2-01.
- B-09 See response to comment 67-01.
- B-10 See response to comment 2-01.
- B-11 See response to comment 2-01.
- B-12 See response to comment 3-11.
- B-13 The boundary adjustments proposed under BLM's Preferred Alternative for the Diamond Breaks Wilderness Study Area were made to enhance manageability. The rationale for this proposal is presented on page 2-21 of the Wilderness Technical Supplement. Such adjustments were not needed for the West Cold Spring Wilderness Study Area.
- B-14 See response to comment 154-06.
- B-15 See response to comment 2-01.
- B-16 See response to comment 141-9.
- B-17 See response to comment 141-10.
- B-18 See response to comment 2-01.
- B-19 See response to comment 2-01.
- B-20 See response to comment 154-14.
- B-21 See responses to comments 154-20 and 154-21.
- B-22 See response to comment 2-01.
- B-23 See response to comment 120-02.
- B-24 See response to comment 2-01.
- B-25 See response to comment 154-02.

## **RESPONSES TO COMMENTS**

B-26 See response to comment 2-01.

B-27 See response to comment 2-01.

B-28 See response to comment 2-01.

B-29 See response to comment 67-01.

B-30 See response to comment 154-14.

B-31 See response to comment 102-02.

B-32 See response to comment 2-01.

B-33 See response to comment 2-01.

C-01 See response to comment 2-01.

C-02 See response to comment 2-01.

C-03 See response to comment 3-11.

C-04 See response to comment 2-01.

C-05 See response to comment 2-01.

## **Text Changes to the Draft RMP/EIS**

# TEXT CHANGES

## Summary

### Page S-2

First column, third paragraph, first sentence. This sentence should read: The management of threatened and endangered species, wild horses, and paleontological resources would continue, as described under the Current Management Alternative.

First column, fifth paragraph, first sentence. Delete the words "and rights-of-way," and add the word "and" after the word "species."

## Chapter 1

### Page 1-7

First column, paragraph 2c. Change text to read: Protect, maintain, or improve all terrestrial and aquatic wildlife habitat.

### Page 1-11

First column, change text under heading Oil and Gas Leasing Umbrella Environmental Assessment.

A comprehensive management program for oil and gas was established for the Little Snake Resource Area in an umbrella environmental assessment (EA) completed in June 1982. The EA assessed probable environmental impacts associated with leasing oil and gas in the resource area, and as the result of this analysis, mitigative measures were developed to reduce or eliminate unacceptable adverse environmental impacts. A part of this analysis consisted of examining proposed mitigative measures to determine if less restrictive measures would be adequate to serve the public interest. These mitigative measures are, in part, brought from the umbrella EA and referenced throughout this RMP as stipulations.

Land-use allocation decisions will be made in the Little Snake RMP to determine areas where leasing would occur with "case-by-case (avoidance), seasonal restrictions, no-surface-occupancy, and standard lease terms" [Umbrella EA form 2, CSO 3100-65 (A) (B), Jan. 1982]. Land-use decisions will also be made in this RMP establishing areas that could be leased if performance standards were met and areas where no oil and gas leasing would be allowed.

Subsequent to completion of the Little Snake RMP, an oil and gas activity plan will be developed for the Little Snake Resource Area to further refine the degree to which oil and gas development will be allowed on lands open to leasing. This activity plan will assess the level of direct, indirect, and cumulative impact resulting from a reasonable foreseeable level of oil and gas development in the resource area. The activity plan will identify any additional necessary and justifiable mitigative measures to reduce or eliminate unacceptable adverse environmental impacts and will also identify any change to oil and gas leasing decisions made in the Little Snake RMP that may be warranted.

At a minimum, the oil and gas activity plan will address the primary, secondary, and cumulative impacts of at least one reasonable foreseeable level of oil and gas development in the Little Snake Resource Area, as stated in the above paragraph. This level of development will be based on resource potential (see enclosed oil and gas map) and historical oil and gas activity in the area. The analysis of impacts will be based on assumptions regarding, for example, the number of wells expected to be drilled in the resource area over the projected life of the Little Snake RMP, the varying density of those wells, typical surface disturbance in acres resulting from oil and gas activity, reclamation potential, the number of acres in a disturbed condition in a typical year, and the total number of acres disturbed during the 20-year period of the Little Snake RMP.

Until this activity plan is approved, the Little Snake oil and gas umbrella EA will continue to be the National Environmental Policy Act compliance document for oil and gas leasing in the resource area. The oil and gas activity plan should be completed by early 1987.

## TEXT CHANGES

### Chapter 2

#### Page 2-2

First column, list number 6. Text has been changed to read:

Implementation of the recommended actions for the resource area would be guided by a series of activity plans. An activity plan is program specific and shows in detail how particular uses provided for in the RMP are to be carried out. It sets forth management actions to accomplish program activity goals, objectives and management actions, including such things as projects, treatments, and other on-the-ground activities, and schedules. Activity plans prepared following the RMP would include a coal activity plan, an oil and gas activity plan, habitat management plans (HMPs) for wildlife, allotment management plans (AMPs) for livestock grazing, landownership adjustment activity plans, watershed plans, and cultural resource management plans. Site-specific management plans would also be required for areas of critical environmental concern (ACECs), for research natural areas (RNAs), for outstanding natural areas (ONAs), for special recreation management areas (SRMAs), and for areas designated by Congress as wilderness. Each plan would delineate the programs and management actions needed to accomplish proper land and resource management.

#### Page 2-5

First Column, fifth paragraph, second sentence. Sentence should be changed to read: Land adjustments could occur. On lands encumbered by mining claims, they would only take place if the land has no "known mineral value," as determined by a BLM geologist or mining engineer, and if the prospective patentee is willing to accept defeasible title.

First column, eighth paragraph (Realty Actions). Delete this paragraph.

First column, text under heading Federal Mineral Concern Areas.

Important, unique, or fragile resources on split-estate lands containing federal minerals may require protection during mineral development. These areas are called federal mineral concern areas (FMCAs). Site-specific mitigation for FMCAs could occur during the mineral activity planning process. This process is not an attempt to dictate to a private surface owner how to manage private surface. Private surface owners, however, are encouraged to become involved in the activity planning process during scoping and public review.

If a significant impact to a resource is identified during the activity planning process, protection or mitigation, which must be consistent with valid existing rights, may be required before the federal mineral can be developed. Any designation in either this document or the activity plan would not dictate pre- or post-mineral development land uses or any other uses unrelated to federal mineral development. (Note: Although there is no federal control of locatables on split-estate lands, the mining claimant is liable to the surface owner for damages to crops and other tangible improvements and is also subject to the state of Colorado reclamation requirements [See 43 CFR 3814].)

#### Page 2-14

Second column, list number 5. Add the following text as the last sentence: The destruction, loss, and degradation of wetlands would be minimized, and the beneficial values would be preserved and enhanced as directed under Executive Order 11990 of May 1977 (Wetlands).

Second column, add list number 7. 7. No surface occupancy stipulations would be added to oil and gas leases when issued in certain areas to protect critical wildlife habitat for raptors, greater sandhill cranes, wildlife watering areas, beaver colonies, sage-grouse strutting grounds, and prairie-dog towns (potential black-footed ferret habitat). These areas vary in size from 10 acres to 640 acres and are scattered throughout the resource area. Data may reveal previously unknown critical wildlife habitat or show that some areas presently identified are not critical wildlife habitat. The total number of acres may vary as habitat is examined. The current Umbrella Environmental Assessment for Oil and Gas Activities identifies 16,240 acres needing no-surface-occupancy stipulations to protect these areas. This document is available for public review at the Little Snake Resource Area office in Craig, Colorado.

## TEXT CHANGES

Second column, first paragraph, first sentence. Sentence should read: High priority habitat for threatened or endangered species or raptors, riparian area, and wetlands would continue to be inventoried and monitored on BLM lands.

Second column, list 4, last sentence. Add the following text: No impacts would be allowed to aquatic habitat, as required by the Clean Water Act, which states that "existing instream water uses and the level of water quality necessary to protect the existing uses shall be maintained and protected."

Second column, list 5, last sentence. Add the following text: In addition, as stated in Section 2 of the act, all threatened and endangered species and their habitats would be conserved.

### Page 2-15

Second column, first partial paragraph, last sentence. This sentence should read: They would emphasize the protection of fragile soil areas and water quality, and water quality parameters would conform with existing or future state and federal water quality standards and regulations for both surface water and groundwater.

Second column, first partial paragraph. Add following text as the last part of this paragraph: BLM would ensure that water quality standards would be met at all points and at all times, except as otherwise allowed by state regulations. These standards would apply on a short-term as well as a local basis.

### Page 2-16

First column, text under Wilderness (Issue 3-1) heading. Move paragraph 1 through 4 to the bottom of column two. Top of column one. Insert heading, Fire Management (Issue 2-9), after paragraph number 4. Drop the number 5.

### Page 2-17

Table 2-2. Delete Priority column.

### Pages 2-27, 2-32, 2-39, 2-45, 2-54, and 2-63

Add to footnote on No Surface Occupancy, Critical wildlife habitat, on tables 2-4, 2-8, 2-13, 2-18, 2-23, and 2-29 (Oil and Gas Leasing Restriction Recommendations): See Resource Specific Guidance, Wildlife Habitat (Issue 2-2), No. 7 (page 2-14).

### Page 2-31

First column, list number 1 under Coal (Issue 1-1) heading. Add the following text after the last sentence. Approximately 266 million tons of coal throughout the region would not be available for surface mining.

### Pages 2-31, 2-38, 2-44, 2-53, and 2-61

On each page listed, under the heading Oil and Gas Development (Issue 1-2), the first sentence should be dropped, and the following should be inserted:

The resource area would generally be available for oil and gas leasing. Areas have been designated for leasing with standard lease terms, seasonal restrictions, avoidance stipulations (performance standards - page 2-62 only), no-surface-occupancy stipulations, or no-leasing. An oil and gas activity plan will be developed after the RMP has been completed to assess the levels of oil and gas development that could be allowed before significant impacts might result. Any additional specific stipulations that would be necessary and justifiable to prevent significant impacts would be developed in the oil and gas activity plan.

### Page 2-33

Second column, text under Fire Management (Issue 2-9). Change text to read:

The RMP will provide overall guidance and resource values that will be used to develop a Fire Management Plan (FMP) for the Little Snake Resource Area. The resource objectives identified in the RMP will provide fire management with the guidelines, direction, and degree of suppression to be used.

Various fire strategies within the LSRA are:

1. Maximum Suppression:

## TEXT CHANGES

This strategy would be applied to areas with high-resource values, structures, commercial forest, oil and gas developments, cultural values, improvements, etc., that require aggressive suppression action. Maximum suppression may also be used in other areas to prevent fire from spreading to adjacent private property/structures. Buffer areas near or adjacent to critical management areas, such as threatened, endangered and candidate species, Colorado BLM sensitive plant species, and Research Natural Areas, may require full protection.

### 2. Minimum Suppression:

This strategy would be applied to areas with resources that are low in value or do not warrant full suppression actions and/or high suppression costs. Response will depend on the potential of the fire and the cost effectiveness of suppression. Suppression strategy may range from immediate, initial attack to indirect responses such as confining or containing fires within a particular area. Initial attack may be used on one portion of the fire, while indirect responses such as burning out, backfiring or allowing the fire to naturally burn to a natural break on a different flank may be used on another portion of the fire. Fires in WSAs, especially Douglas Mountain, Diamond Breaks, West Cold Spring, and Cross Mountain, will be handled under this strategy.

### 3. Prescribe Fire:

Fire will be used in areas with higher resource values and with the potential to improve resource habitat, condition, etc. Prescribe fires will be allowed to burn only under specific conditions and with set parameters. Both planned and unplanned fires will be used.

## Page 2-38

First column, list number 1 under Coal (Issue 1-1) heading. Add the following text after the last sentence. Approximately 275 million tons of coal throughout the region would not be available for surface mining.

## Page 2-44

Second column, paragraph under Coal (Issue 1-1) heading. Add the following text after the last sentence.

Approximately 196 million tons of coal would not be available for surface mining through this alternative.

## Page 2-53

Second column, third paragraph. Add the following sentence at the end of the paragraph. Approximately 183 million tons of coal would not be available for surface mining through the Natural Environment Alternative.

## Page 2-62

Second column, list number 1. Add the following text after the last sentence. Approximately 266 million tons of coal throughout the region would not be available for surface mining.

First column, first partial paragraph, sixth complete sentence. Change text to read: "The Ant Hills, Chew Winter Camp, and Peterson Draw WSAs, which are located along the border of Dinosaur National Monument, would be insignificant in terms of their value and contribution to the NPS area."

First column, first partial paragraph, last sentence. Change "NWPS." to "Monument."

## Page 2-63

Table 2-29. Footnote listed as No. 4 should be footnote No. 5. Footnote No. 4 should read: If performance standards could not be met, surface occupancy would not be allowed. Additional areas within the resource area may have restrictive stipulations imposed on a case-by-case basis to protect fragile soils and water resource values; see Soils/Water Resources (Issues 2-5/2-6) for further discussion.

## Page 2-64

First column, list number 2 under Wildlife Habitat (Issue 2-2) heading. Replace text with the following: 2. Habitat management plans (HMPs) would be prepared and implemented emphasizing aquatic/riparian habitats for priority areas, including Little Snake River, Yampa River, Vermillion Creek, Beaver Creek, Canyon Creek, Dry Creek, Shell Creek, Morgan Gulch, Milk Creek, Fortification Creek, West Timberlake Creek, and Willow Creek.



## TEXT CHANGES

Surveys would be completed on 3,000 acres of riparian and 400 acres of identified wetlands. Inventories would be conducted in order to identify more riparian and wetland habitats in the resource area.

Funding to complete HMPs, surveys, and inventories would be requested annually. Inventory specifics such as monitoring methods and parameters, timeframe, etc., will be decided when funding availability is known.

### Page 2-66

First Column, list number 5. Add following sentence after the first sentence: Compliance with Executive Order 11988 also would be ensured.

First column, list number 4, second sentence. Change the word "might" to "would."

Second column, list number 7, fourth sentence. Add "Funding would be requested and...." at the beginning of this sentence.

Second column, list number 6, add as last sentence. Funding priority will be given to high-energy-potential areas such as coal lease tracts and high-density oil and gas sites.

### Page 2-70

Second column, third paragraph under Major Rights-of-Way (Issue 4-2) heading. Change "70,770 acres" to "63,350 acres."

Add the following after Limestone Ridge (1,350 acres). "Areas of Critical Environmental Concern, Irish Canyon (11,680 acres)"

Second column, last line. Change "166,145 acres" to "97,465 acres" and change "13 percent" to "7 percent."

### Page 2-72

First column, fourth line. Delete "Wildlife Habitat (seasonal restrictions, avoidance stipulations), Cold Spring (60,000)"

First column, 19th line. Delete "Irish Canyon (11,680 acres)."

### Pages 2-74 through 2-81

Table 2-35. Additions have been made to this table, see section on Summary of Impacts by Alternative.

## Chapter 3

### Page 3-7

Figure 3-2. Page has been corrected.

### Page 3-26

First column, fourth full paragraph, last sentence. Change sentence to: Unitization provides for the exploration, development, and operation of an entire structure or area by a single operator so that drilling and production may proceed in the most efficient and economical manner (BLM Manual, Chapter 3180.02).

### Page 3-40

Second column, fourth paragraph. Add the following text. The habitat for Ownbey's thistle is on steep, limestone canyon walls; on cliffs; in crevices; and on talus slopes of sagebrush and scattered juniper. In Colorado, it is known to occur only in Cross Mountain Canyon. In Utah, it occurs in a few locations in Daggett and Unita counties in juniper, sagebrush, and riparian areas.

### Page 3-42

First column, third paragraph, last sentence. Add the following text: If the inventoried acreage was considered to be producing close to its potential in terms of livestock forage, then we considered it to be in satisfactory livestock forage condition. Unsatisfactory acreages are those that are not producing near potential and have a potential for a significant increase in livestock forage through cost-effective livestock management. Unsatisfactory livestock forage condition does not connote low seral stage (poor ecological condition). Many acreages in unsatisfactory forage condition are in medium or high seral stages (fair or good ecological condition).

SYSTEM	SERIES	FORMATION OR GROUP	DESCRIPTION
CRETACEOUS	Upper	Lance Formation	1. Light-gray to yellowish-brown massive sandstone, mudstone, siltstone, shale, and coal.
		Fox Hills Sandstone	2. Gray to light-brown sandstone.
		Lewis Shale	3. Dark-gray shale and thin beds of sandstone.
		Williams Fork Formation	4. Gray to brown, fine- to medium-grained lenticular sandstone; gray to brown shale and claystone, and carbonaceous shale; several lenticular coal beds.
	Mesaverde Group	Hills Formation	5. Light-brown to gray, crossbedded to thin bedded, fine- to medium-grained sandstones, mudstone, claystone, carbonaceous shale and thin coal beds.
	Upper and Lower	Mancos Shale	6. Gray clay shale containing thin beds of siltstone or sandstone. Basal part comprises Lower Cretaceous Mowry Shale Member overlain by Upper Cretaceous Frontier Sandstone Member.
		Hilliard Shale	7. Gray calcareous clay shale, with numerous beds of fine-grained sandstone; some limestone. Largely equivalent to Mancos Shale.
			8. Light-brown to gray, fine- to medium-grained sandstone; local conglomeratic beds; some gray shale and carbonaceous shale.
	Lower	Dakota Sandstone	9. Varicolored bentonitic mudstone, siltstone, and claystone; lenticular beds of sandstone and conglomerate.
		Cedar Mountain Formation	

Figure 3-2

## TEXT CHANGES

Second column, first partial paragraph, first complete sentence. Delete this sentence and add the following text: The unsatisfactory condition of these allotments can be attributed to a number of factors, including big-game concentrations, poor livestock distribution, or the suppression of naturally occurring wildfires.

### Page 3-43

Table 3-11. Add the following after Humpback Chub:

- Bony tail chub Protected by federal and state law.
- Whooping crane Protected by federal and state law

Add the following after Ferruginous hawk:

- Spotted bat Candidate for federal protection
- Long-billed curlew Candidate for federal protection
- White-faced ibis Candidate for federal protection
- Western snowy plover Candidate for federal protection
- Western yellow-billed cuckoo Candidate for federal protection
- Colorado River cutthroat trout Candidate for federal protection

### Page 3-47

Table 3-13 Add the following after Peregrine falcon:

- Species	Status	Occurrence
Whooping crane	E(F,S)	Yampa River and tributaries (potential)
- Bonytail chub	E(F,S)	Yampa River (potential)

### Page 3-47

Table 3-13. Add the following after Bald eagle.

Whooping Crane*	E (F,S)	Western Routt County.
-----------------	---------	-----------------------

### Page 3-52

Second column, first partial paragraph. Add the following sentence at the end of the paragraph. See Table 3 for a summary of typical salt loads within the Yampa River.

Second column, first complete paragraph, second sentence. Add the following text after the second sentence. Table 3 lists a summary of measured values for sediment and salt loads within the Little Snake River and Vermilion Creek.

Second column, third complete paragraph. Change text to read: The Water Quality Control Commission of the Colorado Department of Health has compiled a listing of standards for the Yampa and Green River drainage basins. These documents, titled "Classifications and Numeric Standards for the Colorado River Basin and "the Basic Standards and Methodologies," define physical, biological, inorganic, and metal water quality requirements.

Add Table 3 after page 3-52.

### Page 3-71

First column, second paragraph, second sentence. Change the word "floatboating" to "general tourism."

## Chapter 4

### Page 4-4

Second column. Add the following text as second paragraph.

The level of air quality impact analysis presented in this document for all alternatives is general. Specific impacts to the air resource will be analyzed when the nature, location, and detail of development plans are known and pollutant emissions are specified.

### Page 4-14

First column, text under Issue 2-1: Livestock Grazing. Replace first two paragraphs with following text.

Livestock management systems and associated range improvement projects would have a variety of impacts on the vegetation. Proper livestock grazing can benefit the health and vigor of grazed plants by preventing plants from becoming decadent, while also contributing to the natural

## TEXT CHANGES

**TABLE 3**  
**STATISTICAL SUMMARY OF SELECTED WATER QUALITY**  
**PARAMETERS IN THREE LITTLE SNAKE RESOURCE AREA**  
**STREAMS**

Parameter	n	Mean	Standard Deviation	Minimum Value	Maximum Value
<u>(Yampa River (near Maybell, CO)<sup>1</sup></u>					
Instantaneous discharge (cfs)	144	1,823	2,947	32	13,600
Dissolved solids(tons/day)	719	754	950	41	8,440
<u>(Little Snake River (near Lily, CO)<sup>2</sup></u>					
Instantaneous discharge (cfs)	144	1,098	1,908	47	13,400
Dissolved solids (tons/day)	7	625	850	169	2,460
Suspended solids (tons/day)	100	9,747	18,556	13	90,800
<u>Vermillion Creek (at Highway 318)<sup>3</sup></u>					
Instantaneous discharge (cfs)	31	12.1	11.7	1.0	46.1
Dissolved solids (tons/day)	31	36	37	2	139
Suspended solids (tons/day)	13	322	393	0.3	988

<sup>1</sup> Data is summarized from grab samples for water years 1976 to 1981 and is drawn from Mavra, 1982

<sup>2</sup> Data is summarized from continuous samples for water years 1983 to 1984 and is drawn from Duncan et al., 1984 and Steinheimer et al., 1983.

<sup>3</sup> Data is summarized from grab samples for water years 1981 to 1986 and was collected by BLM personnel; dissolved solids are estimated from specific conductance data.

reseeding of existing plants. Light to moderate trampling on some soils can enhance soil infiltration, by providing small ponding areas (in hoof depressions) or by breaking up a seal-forming surface crust. Trampling also may promote seed implantation into the surface soil and thereby increase the seed viability.

On the other hand, excessive utilization of forage plants decreases vigor, seed production, and eventually leads to a decline of palatable forage plants and a increase in undesirable plants. Heavy or extreme trampling can compact the soil surface, restricting water infiltration and seeding establishment.

Sagebrush manipulation projects that do not reseed with nonnative species would remove dominant sagebrush and thereby allow other native species to increase. Such treatments would raise the seral stage to High (Good) or Climax (Excellent), and proper use should help retain the

range site in its raised seral stage. These techniques would improve livestock forage condition as well as raise the ecological seral stage.

Reseeding projects would accomplish the same benefits to livestock forage; however, the nonnative species would lower the seral stage. Again, proper use would keep this forage site in its lower seral stage over the long term.

First column, fourth complete paragraph, last sentence. Add the following text as last sentence: Although the net change in the status of federal acres may be small, the actual acres involved in these changes are significant.

Second column, first complete paragraph, first sentence. Change "141,989 AUMs" to "14,989 AUMs."

Second column, first partial paragraph. Insert following text at the end of this paragraph. It should be emphasized that over the last 5 years, approximately 32 percent of the

area has been voluntarily nonused; therefore, the predicted decline is not presently occurring.

## Page 4-15

First column. Add the following text under the heading Issue 2-2 Wildlife Habitat.

As with livestock, big game can have both positive and negative impacts on the vegetation of the area. Light to moderate browsing and forging can stimulate forage production; however, large concentrations of animals can lead to overutilization of forage plants, resulting in unfavorable changes in plant communities. Because of their wild and free roaming nature, wildlife use of an area is extremely difficult to regulate. This unregulated use makes the management of the forage even more critical when unusually large numbers of big game concentrate in areas where most of the available forage has been allocated to existing livestock operations.

Many of these big game problems are also compounded by the variable nature of the locations. Although some areas receive wildlife pressure each year, other areas experience periodic problems, depending on the annual winter weather patterns.

The development of wildlife habitat improvement projects could resolve many of the problems associated with localized big game concentrations.

## Page 4-21

Second column, last paragraph. Add following text after the last paragraph.

Aspen communities are also critical to the life cycles of many nongame birds and mammals, including goshawk, sharp-shinned hawk, mountain bluebird, MacGillivray's warbler, yellow-bellied sapsucker, warbling vireo, beaver, and several species of shrews, voles, and mice. There is a potential for significant adverse impacts to populations of these species under this alternative.

Significant impacts to wildlife species and habitat from regional human population increases could also result from energy and mineral development. Residential, commercial, and community development would affect wildlife through direct habitat losses. Outdoor activities, such as hunting,

fishing, snowmobiling, and off-road driving, would place increased pressure on wildlife populations by affecting their ability to fully utilize available habitat. Harassment, poaching, and road kills would also be expected to increase significantly with expanding human population. The significance of these impacts on wildlife habitat from energy and mineral development would depend on several factors, including: (1) sensitivity of the species to disturbance; (2) seasonal or important uses of the area such as courtship activities, reproduction, migration, and wintering; (3) relative importance of the affected area to wildlife; (4) availability and condition of adjacent habitats, plus the potential for increase in competition for forage with other wildlife; (4) availability and condition of adjacent habitats, plus the potential for increase in competition for forage with other wildlife or livestock; and (5) size and expected duration of the development.

## Page 4-24

Second column, last paragraph, Third and fourth sentences. Delete those two sentences.

## Page 4-25.

First column, second complete paragraph, second sentence. Change the word "direct" to "total."

Bottom of the first column and top of the second column. Delete this paragraph.

## Page 4-38

First column, second complete paragraph. Delete entire paragraph.

First column, first complete paragraph, third sentence. Delete the words "on a regional basis" and add the words "within the Yampa and Green rivers."

Second column, first partial paragraph. Add the following text after the last sentence. Disturbance to wells and springs could also adversely affect wetlands. Appropriate mitigative measure would be required to ensure that significant impacts to wetlands did not occur.

## TEXT CHANGES

### Page 4-39

Second column, first paragraph under Issue 2-1: Livestock Grazing heading. Add the following text: "... (3) the presence of livestock wastes, which increases bacteria in surface waters."

### Page 4-40

Second column, last paragraph before Issue 2-2: Wildlife Habitat heading. Add the following text:

Under all the alternatives, cattle could raise bacteria levels in local surface waters. During runoff events, concentrations of bacteria from the fecal coliform group (*Escherichia coli*) commonly increase dramatically in surface waters (coliforms indicate the presence of fecal contamination that may contain pathogenic organisms such as salmonella, shigella, and enteric viruses). This occurs because cow feces provide a protective medium for coliform survival and release high amounts of coliforms during rainfalls. Surface water impacts for coliforms would be about the same under all the alternatives, with the exception of the Natural Environment Alternative, where impacts could be less because of the decrease in grazing preference.

### Page 4-71

First column, fifth paragraph. Change text to read: The coal withdrawals and Classification and Multiple Use Act preclude only nondiscretionary actions under previous authorities. These actions are now discretionary and are subject to site-specific analyses.

Add the following table and text after the last paragraph.

The federal government would contribute monies to state and local governments to mitigate the effects of federal leasing and landownership. The Federal Lands Policy and Management Act (FLPMA), Section 317 (a), provides that 50 percent of all monies received from sales, bonuses, royalties, and rental of public lands to be paid to the state where the leased lands or deposits are located. Monies are to be used as the legislature of the state may direct; priority is given to state subdivisions socially or economically impacted by

TABLE 4-18b  
DOLLARS GENERATED IN 1983

Year County Generated	Total (50%)	State Share Share	County
1983 Moffat	8,309,170	4,154,585	393,750
1983 Routt	11,500,000	5,500,000	393,750

development of minerals leased under this act, as shown under the county in Table 4-18b. Colorado Senate Bill 35 (1977) distributes the state's share:

Category	Percentage Share
Public School Fund	25
Energy Impact Assistance Fund	15
Colorado Water Conservation Board	10
County involved	50-up to \$800,000

Any annual excess over \$800,000 goes to the public school fund. Counties may also receive additional funds through project grants from the Energy Impact Assistance Fund or through other federal programs. Table 4-18b shows 1983 monies generated in the two counties as a result of federal leasing and the amount returned to state and local governments. Together, the two counties generated just under 20 million dollars in 1983, from rentals and royalties of public lands.

The counties' share of generated royalties and rentals is subject to 34-63 Colorado Revisal Statute, which places the 50 percent federal return subject to distribution approval of the state legislature. Severance taxes imposed by the states are also used for economic and social mitigation. In addition, towns and counties have authority to impose zoning and to negotiate tax prepayment and other arrangements with industries for these purposes.

Any projection indicating future distribution of monies would be dependent on price and quantity and highly speculative at this point, especially since rapid price fluctuations abound in the extractive industries.

## TEXT CHANGES

### Page 4-72

Table 4-18. The following changes have been made. It is now Table 4-18a. The first column should read "Production (tons)" and "Employment," not "Production" and "Tons/Employment." The figure "9,234" under the 1985 heading should read "961."

### Page 4-74

Table 4-20. Source number 2 should be changed to: 1980 survey for Colorado Division of Wildlife, John McKean.

## Appendices

### Appendix 1

#### Page A1-2

Second column, first partial sentence. Add the following text after the word accordingly.

It is not known if these lands are actually minable by either surface or underground methods. All of the lands with any data indicating a potential for minable coal seams have been included in an effort to be better prepared to respond to any coal development or exploration that might occur in the future.

### Appendix 2

#### Page A2-11

First column, second paragraph. Add the following sentence to the end of the paragraph:

(Note: Consultation, as used here, does not refer to consultation that may be required under Section 7 of the Endangered Species Act.)

#### Page A2-12

First Column. Consultation Section. First sentence, add the word "Informal" at the beginning of the sentence.

Last sentence, add the following sentence before the material in parenthesis: The consultation carried out under this criterion is not the formal consultation required under Section 7 of the Endangered Species Act.

#### Page A2-17

First column, second full paragraph, add the following text.

The aquatic habitat is very limited within the coal planning area. The CDOW did not indicate any critical aquatic habitat warranting unsuitability. Any adverse impacts will be mitigated by requiring appropriate stipulations.

#### Page A2-22

First column, first paragraph under the heading Analysis. The paragraph should be changed to read:

The state of Colorado has not identified any water courses in the coal planning area as National Resource Waters in completed water quality management plans. The quantity of data available is inadequate. The quality of listing data is fair. Further analysis should be done at the coal activity planning stage to identify any water courses that may be identified in the future.

First sentence under the heading Results should read: No water courses are unsuitable since no National Resource Waters have been identified by the state of Colorado.

Add the following text after the section titled Results and before the heading Criterion 19 - Alluvial Valley Floors:

#### Consultation

Informal consultation was carried out with the Colorado Department of Natural Resources and Colorado Department of Health. Both agencies indicated they were not identifying National Resource Waters; however, the Department of Health has classified some waters as High Quality Waters, Class I and II. The High Quality Waters, Class I, are all outside the federal coal planning area; therefore, even if they may meet the criteria for National Resource Waters, they would not be included in the unsuitability analysis.

Second column, last paragraph. Add the following paragraph.

Analysis of federal lands outside any alluvial valley floors or potential alluvial valley floors, where mining would materially damage the quantity or

## **TEXT CHANGES**

quality of water in surface or underground water systems that supply alluvial valley floors, will be deferred with development of specific mine plans or as more data becomes available.



**Errata**

# ERRATA

First column, fourth complete paragraph, first sentence.  
Change the word "until" to "unless."

## Chapter 1

### Page 1-1

Second column, second paragraph, second sentence.  
Change the word "development" to "leasing."

First column, second paragraph, second to last sentence.  
Change "... depicted on the alternative maps." to "... depicted on any alternative map."

### Page 1-4

First column, third paragraph, second to last sentence.  
Change "... contained in the appendices." to "... contained in Chapter 2."

### Page 1-7

Second column, number 9. This should be part of number 8, and number 10 should be number 9.

## Chapter 2

### Page 2-3

Second column, fourth complete paragraph, first sentence.  
Change "... Surface Mining Coal Reclamation Act...." to "... Surface Mining Control and Reclamation Act of 1977...."

### Page 2-5

First column, third complete paragraph, first sentence.  
Change the word "until" to "unless."

### Page 2-6

First column, second paragraph under Oil and Gas heading. Add "under the Preferred Alternative." to the end of the last sentence.

### Page 2-7

Second column, eighth paragraph (Wild Horses). This heading should be the same level as Wildlife Habitat heading in column one.

### Page 2-8

Second column, third paragraph, last sentence. Change sentence to read, "If water sources were fenced out as part of a watershed improvement project, water sources would be developed for livestock."

### Page 2-9

First column, second paragraph under "Fragile Soil and Watershed Areas" heading, last sentence. Change "Watershed Values" to "Water Resources."

### Page 2-13

First column, first paragraph under "Other Mineral Development (Issue 1-3)" heading, last sentence. Change 43 CFR 3800 to 43 CFR 3809.

### Page 2-16

## ERRATA

First column, first paragraph, list number 3. Change text to read: Attempts will be made to regenerate nonstocked or poorly stocked stands within either 5 or 15 years after harvest, depending on the timber production capability classification of the site.

### Page 2-24

Map 2-3. Area 11 on page 2-24 should read area 17.

### Page 2-27

Table 2-4, column titled Percentage of Federal Oil/Gas Acreage. The second figure "1" should be subtotal figure. Add last line to table:

Standard stipulations 1,148,890 Remaining federal oil/gas acreage.

### Page 2-31

First column, list number 1 under Coal (Issue 1-1) heading, second sentence. Change "5.5 billion" to "4.2 billion" and "2.7 million" to "1.3 billion."

### Page 2-38

First column, list number 1 under Coal (Issue 1-1) heading, second sentence. Change "5.5 billion" to "4.1 billion" and "3.4 million" to "1.4 billion."

### Page 2-39

Table 2-13, fourth column, 13th line. Drop the word "canyon" after Diamond Breaks.

### Page 2-42

First column, second paragraph, third sentence. Drop the words "or reissued."

Second column, list number 2 under Major Rights-of-Way heading, fourth line. Change "64,971" to "61,971."

### Page 2-44

First column, second paragraph, first sentence. Change "pages 5-6" to page "A1-2."

Second column, paragraph under Coal (Issue 1-1) heading. First sentence, change "3.3 billion" to "5.2 billion." Second sentence, change "3.1 billion" to "4.0 billion" and "2 million" to "972 million."

### Page 2-48

Second column, number 1 under Natural History (Issue 3-2). Change the word "designed" to "designated."

### Page 2-53

Second column, paragraph under Coal (Issue 1-1) heading. First sentence, change "3.1 billion" to "4.9 billion." Second sentence, change "2.9 billion" to "3.6 billion" and change "2 million" to "1.1 billion."

### Page 2-54

Table 2-23, change last line to:

Stipulations 1,001,111 53 Remaining federal oil and gas acreage

Add the following text between Subtotal and Standard Stipulations.

No

New

Leasing 14,108

1 Cross Mountain  
WSA, including  
Cross Mountain  
Canyon ACEC  
(proposed for  
wilderness  
designation)  
Diamond  
Breaks, WSA  
(proposed for  
wilderness  
designation)  
West Cold  
Spring WSA

35,380

17,682

## ERRATA

4,354	(proposed for wilderness designation) Ant Hills WSA
1,320	(proposed for wilderness designation) Chew Winter Camp WSA
5,160	(proposed for wilderness designation) Peterson Draw WSA (proposed for wilderness designation)
5,490	Tepee Draw WSA (proposed for wilderness designation)
7,420	Vale of Tears WSA (proposed for wilderness designation)
<hr/>	
Subtotal 90,887	5

### Page 2-55

Second column, number 3 under Soils and Water Resources (Issues 2-5 and 2-6). First word should be "Nonstructural" not "Monstructural."

### Page 2-56

First column, number 3 under Forest Lands and Woodlands (Issues 2-7 and 2-8), second sentence. Should read, "... under limited management to maintain and ...."

### Page 2-62

Second column, list number 1 under Coal (Issue 1-1) heading. Change "5.4 billion" to "4.2 billion" and "4 million" to "1.3 billion."

### Page 2-63

Table 2-29, column titled Estimated Acreage, 10th line. Figure 880 should not be across from Canyon SRMA. Column titled Area, 17th line. Add Cedar Mountain SRMA. Add footnote number 4

<sup>4</sup> If performance standards could not be met, then surface occupancy would not be allowed. Additional areas within the resource area may have restrictive stipulations imposed on a case-by-case basis to protect fragile soils and water resource values; see Soils/Water Resources (Issues 2-5/2-6) for further discussion.

The footnote listed as number 4 should be number 5.

### Page 2-64

First column, list number 1 under Wildlife Habitat (Issue 2-2), first sentence. Change "18,400 elk" to "5,700 elk" and "7,500 pronghorn" to "5,600 pronghorn."

### Page 2-65

Second column, eighth paragraph, last line. Add "consistent with lease rights granted," after the word leases.

First column, eighth paragraph. Add "35,800 acres, which is" after the word "approximately."

### Page 2-66

First column, number 3, last sentence. Change "... areas and an alternate water...." to "... areas, although a water...."

### Page 2-68

First column, number 2, Limestone Ridge RNA, line 4. Add the word "leases" after the word "new."

### Page 2-71

Table 2-34, column titled Purpose and Restrictions of Usage, last line. Should read, "wildlife, recreation, public safety; closed to vehicle use"

Delete last line of footnote.

## ERRATA

### Page 2-72

First column, 11th line. Figure should be 38,840 acres, not 35,840 acres.

## Chapter 3.

### Page 3-7

Figure 3-2. Page has been replaced, see Text Changes.

### Page 3-17

Table 3-4. Heading titled "Metals" should read "Base/Precious Metals." Heading titled "Base/Precious Other" should read "Other."

### Page 3-21

First column, fourth paragraph, second and third sentences. Should read.

Several major structural features have significant influence on the localization of oil and gas within the resource area. Most important are the west/northwest-east/southeast trending Uinta Mountain Uplift; its likely extension, the northwest-southeast trending Axial Basin Uplift-Anticline; and the Sand Wash Basin. Stratigraphically, there are possible oil and gas reservoirs within rock units from Devonian through Tertiary age in various rock types.

### Page 3-40

Second column, first paragraph under Threatened, Endangered, Candidate, and Colorado BLM Sensitive Plant Species, second sentence. Change "two species" to "three species" and add *Cirsium ownbeyi* (Ownbey's thistle).

### Page 3-44

First column, first paragraph, last sentence. Delete "which is located in a canyon that is inaccessible to livestock" from this sentence.

Second column, fourth complete paragraph, first sentence. Change "30 percent" to "31 percent."

### Page 3-56

Table 3-16, column titled "Size (acres)," fourth line, change 30,840 to 31,480. Sixth line, change 34,740 to 35,380. Last line, change 90,247 to 90,887.

### Page 3-62

Map 3-7. Number 13 should read, Little Yampa Canyon ONA, not Little Juniper Canyon ONA.

### Page 3-76

Table 3-25, column titled Formation, "Chinarump" should be "Shinarump."

## Chapter 4

### Page 4-5

Second column, first full paragraph, first line. Should read, "The Current Management Alternative is not favorable for future coal development."

Second full paragraph. Delete the words "...exploration and...."

Third full paragraph, first sentence. Delete the words "...exploration and...."

### Page 4-6

Table 4-1, column titled "Preferred," ninth line. Figure should read 2,280, not 2.280. Sixteenth line, figure should read 173,069, not 178,469. Seventeenth line, figure should read 69,167, not 63,767.

## ERRATA

Table 4-1. Change the figures in the "Total Coal Tonnage Available" line to the following: 2,793,000,000 5,574,000,000 5,564,000,000 5,008,000,000 4,674,000,000 5,574,000,000.

### Page 4-8

Table 4-2, column titled "Total Acres." Last line should read 87,550, not 97,550.

### Page 4-21

Second column, second paragraph under Wildlife Habitat, first sentence. Change the word "gig" to "big."

### Page 4-25

First column, second full paragraph, second sentence. Change the word "direct" to "total."

### Page 4-38

First column, first partial paragraph, first complete sentence. Change the word "Milk" to "Middle" and add "...and several tributaries within the Milk Creek Basin" after the word "creeks."

### Page 4-71

Second column, first full paragraph, change 43 CFR 3804 to 43 CFR 3809.

Second column, first full paragraph, second sentence. After the word "minor" add "(approximately 12, 500)."

### Page 4-84

Second column, first sentence. Change the word "would" to "could."

### Page 4-86

First column, first paragraph under Recreation heading, first sentence. Delete the words "...would be desirable."

First column, last paragraph, second sentence. Change the word "would" to "could."

## Appendices

### Appendix 2

#### Page A2-2

Table A2-1. Change the figures in the "Total Coal Tonnage Available" line to the following:

2,793,000,000 5,574,000,000 5,564,000,000 5,008,000,000 4,674,000,000 5,574,000,000

#### Page A2-24

Table A2-7. Second column titled "Locations." Under line T.5 N., R. 92 W., 6th P.M., add "Sec. 10, 11, 12". Second column titled "Contour Line (ft), " line 17. Add 6160 (following 6120).

## Appendix 6

#### Table A6-2

First page, column titled Allotment Number, first line, change "4602" to "4202." Column titled Allotment Name, second line, change "Poweder" to "Powder." Fifth line, change "Sanke" to "Snake."

Second page, column titled Allotment Name, third line, change "Sand" to "South." Twelfth line, change "Waipiti" to "Wapiti." Fourteenth line, change "Sandhill" to "Sandhills."

Third page, column titled Allotment Name, 18th line, change "File" to "Five."

Fourth page, column titled Allotment Name, 14th line, change "Doffy" to "Duffy."

Sixth page, column titled Allotment Name, seventh line, change "Board" to "Bord." Eighteenth line, change "Tu-61" to "LU-61." Twenty-first line, change "Gulch" to "Gulch." Twentieth line, move "200" from column titled Climax to column titled Total Federal Acres."

## **ERRATA**

Seventh page, column title Allotment Name, first line, change "Morapose Ck." to "Morapos Creek." Sixteenth line, change "Marapos" to Morapos."

## **Appendix 8**

### **Page A8-8**

Table A8-1 has been retyped.

Table A8-2, page A8-15. Last line; all entries should be moved over one column to the right.

## **Appendix 9**

Table A9-1. Has been redone

## **Appendix 11**

Table A11-4. Delete the column titled Chemical Reseed. All figures in this column should be in the column titled Chemical. Last line of table, total figure under column titled Chemical should be changed from "6,598" to "10,854."

TABLE A8-1 (cont'd)

## SECTION 15 LEASES

(Acres)

FORAGE CONDITION

Allotment Number	Allotment Name	Manage- ment Category	Total Federal Acres	Satis- Factory	Unsatis- factory	Undeter- mined	Season of Use		Grazing Preference by Livestock Class			Grazing (AUM) Prefer- ence
							From	To	Cattle	Sheep	Horse	
4191		C	199			199	05/01	09/30		66		66
4192		C	754			754	05/01	10/15	168			168
4193		C	1,010			1,010	06/15	10/31	289			289
4194		C	353			353	05/01	10/02	52			52
4195		C	280			280	05/01	09/30	51			51
4196		C	120			120	05/01	05/31	17			17
4197		C	261			261	05/01	09/30		41		41
4198		C	671			671	05/01	09/30	90			90
4199		C	265			265	05/01	09/30	35			35
4650		C	1,011			1,011	06/01	10/15		60		60
4651		C	159			159	04/01	11/15	29			29
4652		C	445			445	05/01	09/30		74		74
4653		C	19			19	05/01	5/31	4			4
4654		C	533			533	05/01	10/31	40			40
TOTAL = Section 15			128,574	9,186	5,317	114,071			12,598	14,069	589	27,256
SUMMARY (both Sections 3 and 15)			1,256,540	381,064	463,177	412,299			77,837	86,083	2,975	166,695



**TABLE A9-1**  
**RANGE MANGEMENT OPPORTUNITIES AND ACTION**

<b>Allotment #</b>	<b>Resource Conflicts/Problems</b>	<b>Management Opportunities</b>
4202	1, 3a, 5, 11, 7	1, 3, 5, 11, 4, 7
4203	1, 4, 11, 7	1, 4, 11, 7
4204	1, 2, 5, 11, 4, 7	1, 2, 5, 11, 4, 7
4205	3a	3
4206	1, 3a, 4, 5, 6, 8h, 9, 11, 7	1, 3, 4, 5, 6, 8, 9, 11, 7
4207	1, 5, 9, 6, 11	1, 5, 9, 11, 6
4209	4, 6, 11	4, 6, 11
4210	3a, 5, 11	1, 5, 3, 11
4212	5	5
4213	1, 4, 5, 7, 11	1, 4, 5, 7, 11
4214	1, 2, 4, 5, 7, 11	1, 2, 4, 5, 7, 11
4215	1, 4, 7, 11	1, 4, 7, 11
4216	1, 4, 5, 7, 11	1, 4, 5, 7, 11
4217	1, 4, 7, 8a, 9, 11, 3a, 5	1, 4, 7, 8, 9, 11, 3, 5
4218	1, 4, 5, 8b, 11, 7	1, 4, 5, 8, 11
4219	1, 4, 5, 7, 8a, 11	1, 4, 5, 7, 8a, 11
4220	5	5
4222	1, 4, 5, 6, 11	1, 4, 5, 6, 11
4223	1, 4, 7, 11, 5, 10	1, 4, 7, 11, 5, 10a
4224	1, 3a, 5	1, 3, 5, 4
4225	1, 4, 11, 7	1, 4, 11, 7
4226	1, 4, 5	1, 4, 5
4300	1, 4, 3b, 3d, 7, 11	1, 4, 3, 7, 11
4301	1, 3d, 7	1, 3, 4, 7
4302	1, 3b, 3d, 8c, 8d, 7 8f, 8g, 9, 11, 5	1, 3, 5, 8, 9, 11, 4, 7
4303	1, 3b, 9, 5, 7, 11	1, 3, 9, 4, 5, 7, 11
4304	1	1, 4
4305	1, 5	1, 5
4306	1	1
4307	1, 2, 3a, 4, 5, 8h, 7	1, 2, 3, 4, 5, 8, 7
4308	1, 2, 4, 8h, 5, 7	1, 2, 4, 5, 8, 7
4320	3b, 7	3, 4, 7
4322	1, 5	1, 5
4324	4, 5, 7	4, 5, 7
4325	1, 4, 5, 11	1, 4, 5, 11
4326	3b, 3c, 4, 5, 8e, 7, 11	3, 4, 5, 8, 7, 11
4327	1	1, 4
4335	1, 4, 5, 3b, 3j	1, 4, 5, 3
4337	2, 4, 5, 8f, 3b	2, 4, 5, 8, 3
4338	1, 5	1, 5
4340		4
4400	1, 4, 5, 8i, 7	1, 4, 5, 8, 7
4402	1, 4, 5, 6	1, 4, 5, 6
4403	4, 5, 7	4, 5, 7
4404	1, 4, 9, 5, 7	1, 4, 5, 9, 7
4407	1, 4, 5	1, 4, 5
4410	4	4
4411	1	1

**TABLE A9-1 Continued**  
**Range Management Opportunities and Action**

<b>Allotment #</b>	<b>Resource Conflicts/Problems</b>	<b>Management Opportunities</b>
4413	1, 4, 5	1, 4, 5
4414	1, 5	1, 5
4415		4
4416	5, 9	5, 9, 4
4419	1	1
4421	2	2
4422	1, 5	1, 5
4430	2, 5	2, 5
4431	1, 2, 5, 3h, 4, 5, 7, 11	1, 2, 5, 11, 3, 4, 7
4432	1, 3a, 3f, 5, 8k, 11	1, 3, 5, 8, 11
4435	1, 5	1, 5
4436	1, 5	1, 5
4438	4, 5	4, 5
4440	2	2
4500	5	5
4501	5	5
4506	1, 3g, 8m	1, 3, 8
4507	5	5
4508	1, 2, 3g	1, 2, 3
4509	1	1
4510	1, 5, 3i	1, 5, 3
4511	1, 5, 8l	1, 5, 8
4512	5	5
4514	1, 5, 3i	1, 5, 3
4515		4
4516	4, 5	4, 5
4517		4
4518	1, 4, 5, 7, 11	1, 4, 5, 7, 11
4519	1, 5, 9, 3a This common allotment needs to be divided into several individual allotments.	1, 5, 9, 3a Create 2 allotments out of this large common allotment.
4520	1, 5, 3a, 7, 11	1, 5, 3, 7, 11
4521	1, 5, 3a, 7, 11	1, 5, 3, 4, 7, 11
4522	1, 5, 7, 10, 11	1, 5, 7, 10b, 11
4523	1, 5	1, 5
4528	1, 5	1, 5, 4
4535	4, 5	4, 5
4538	1, 5	1, 5
4546	5	1, 5
4548		4
4549	4, 5	4, 5
4550	1	1
4551	1	1, 4
4600	5	5
4602	1, 5	1, 5
4603	1, 3f, 5, 8k, 3e	1, 3, 5, 8
4606	5	5
4609	5	5
4611	1	1
4615	1, 12, 5	1, 5
4617	1	1

## **Appendices**

## **Appendix 26**

### **Withdrawals**

## APPENDIX 26

### I. Juniper Reclamation Project\*

The following described public lands were withdrawn under Secretarial Orders dated March 25, 1905; July 21, 1915; August 27, 1915; and May 16, 1917; and under Public Land Orders 3735 (July 6, 1965), 37361 (July 6, 1965), and 3505 (August 30, 1965):

T. 5 N., R. 91 W.

Sec. 6: Lots 13 and 14;

T. 6 N., R. 91 W.

Sec. 18: Lot 19;

Sec. 29: Lot 3;

Sec. 30: Lots 5, 6, and 8;

Sec. 31: Lots 9;

T. 5 N., R. 92 W.

Sec. 1: Lots 5, 7, 8, and that part of lot 10 lying in what would normally be the SE1/4 NE1/4, SW1/4 NW1/4, SE1/4 NW1/4, SW1/4, NW1/4 SE1/4, SW1/4 SE1/4;

Sec. 2: Lots 8 and 13;

Sec. 3: Lots 13, 15, 17, SE1/4 SE1/4;

Sec. 4: Lots 5 and 9, SE1/4 NE1/4, NE1/4 SE1/4, SW1/4 SE1/4, S1/2 SW1/4;

Sec. 5: Lots 11 and 13, S1/2 SE1/4;

Sec. 6: Lots 10 thru 14 inclusive and lot 19;

Sec. 7: Lots 5, 6, 7, 9, 10, and lots 12 thru 14 inclusive, NE1/4 NW1/4; SE1/4 SW1/4; N1/2 NE1/4;

Sec. 8: Lots 1 and 2, N1/2 N1/2, SE1/4 NW1/4, SE1/4 NE1/4, SW1/4 NE1/4, SE1/4 SW1/4, SW1/4 SW1/4; NE1/4 SW1/4, N1/2 SE1/4;

Sec. 9: Lots 2 and 3, NW1/4, N1/2 S1/2;

Sec. 10: Lots 1 and 3, NE1/4, SE1/4 NW1/4;

Sec. 11: Lots 1, 3, 4, 5, 6, SW1/4 NW1/4, NE1/4 SW1/4, N1/2 SE1/4;

Sec. 12: NW1/4, W1/2 NE1/4, N1/2 SW1/4, NW1/4 SE1/4;

Sec. 17: NW1/4 NW1/4, SW1/4 NW1/4, W1/2 SW1/4;

Sec. 18: NW1/4 NE1/4, NE1/4 NW1/4, E1/2 E1/2, SW1/4 NE1/4;

Sec. 19: Lots 9 thru 11, inclusive, SE1/4 SE1/4;

Sec. 20: W1/2 W1/2;

T. 6 N., R. 92 W.

Sec. 25: Lot 1;

Sec. 29: S1/2 NW1/4, NW1/4 SW1/4, SE1/4 SW1/4;

Sec. 31: Lots 7 and 9, S1/2 NE1/4, E1/2 SW1/4, SE1/4;

Sec. 33: NE1/4 SE1/4;

Sec. 34: Lot 1;

Sec. 35: Lot 1, E1/2 NW1/4;

Sec. 36: Lots 5 and 7, SE1/4 SW1/4;

T. 5 N., R. 93 W.

- Sec. 1: Lots 5 thru 8, inclusive, S1/2 N1/2, N1/2 S1/2, SW1/4 SW1/4, SE1/4 SE1/4, SE1/4 SW1/4, SW1/4 SE1/4;  
Sec. 2: Lots 7, 9, S1/2 NW1/4, SE1/4 SW1/4, N1/2 SW1/4, SE1/4, SW1/4 SW1/4;  
Sec. 3: Lots 6, 7, and 8;  
Sec. 4: Lots 5, 6, S1/2 NE1/4, NW1/4 SW1/4, S1/2 SW1/4;  
Sec. 5: Lots 5 thru 8 inclusive, S1/2 N1/2, S1/2;  
Sec. 6: Lots 8 thru 14 inclusive, S1/2 NE1/4, SE1/4 NW1/4, E1/2 SW1/4, SE1/4;  
Sec. 7: Lots 5 thru 8 inclusive, E1/2, E1/2 W1/2;  
Sec. 8: N1/2, NE1/4 SE1/4, S1/2 SE1/4, NW1/4 SE1/4;  
Sec. 9: W1/2 NE1/4, NW1/4, S1/2, SE1/4 NE1/4;  
Sec. 10: W1/2 SW1/4;  
Sec. 11: N1/2 N1/2;  
Sec. 12: E1/2 NE1/4, NW1/4 NE1/4, N1/2 NW1/4;  
Sec. 15: W1/2 W1/2, E1/2 SW1/4;  
Sec. 17: N1/2 NE1/4, S1/2 NW1/4, S1/2;  
Sec. 18: Lots 5, 6, NE1/4 NW1/4, E1/2, SE1/4 NW1/4, NE1/4 SW1/4;  
Sec. 21: Lots 3, 8, 9, W1/2 NW1/4;

T. 6 N., R. 93 W.

- Sec. 11: SW1/4, SW1/4 SE1/4, N1/2 SE1/4;  
Sec. 14: NW1/4 NW1/4;  
Sec. 15: NE1/4 NE1/4, S1/2 N1/2, NW1/4 NW1/4, NE1/4 SW1/4, S1/2 SW1/4, SE1/4, NW1/4 NE1/4, NE1/4 NW1/4, NW1/4 SW1/4;  
Sec. 19: Lot 6, SE1/4 SE1/4;  
Sec. 20: S1/2 SE1/4, SE1/4 SW1/4, N1/2 SE1/4;  
Sec. 21: NE1/4 NE1/4, S1/2 NE1/4, S1/2, NW1/4 NE1/4;  
Sec. 22: N1/2 NW1/4, SW1/4 NW1/4;  
Sec. 24: SW1/4, NW1/4 SE1/4, SW1/4 SE1/4;  
Sec. 25: NW1/4, NW1/4 SW1/4;  
Sec. 26: E1/2 NE1/4, S1/2 SW1/4, SE1/4;  
Sec. 27: S1/2 S1/2;  
Sec. 28: Lots 1, 3, N1/2 N1/2, SW1/4 NE1/4, S1/2 SW1/4, W1/2 SE1/4, SE1/4 NE1/4, SE1/4 SE1/4;  
Sec. 29: Lots 1, 2, and 4 thru 7, inclusive, N1/2 NE1/4, NW1/4, N1/2 SW1/4, SW1/4 SW1/4;  
Sec. 30: Lots 5, 6, 7, 10, 13, 14, NE1/4 NE1/4, S1/2 NE1/4, SE1/4 NW1/4, N1/2 SE1/4, NW1/4 NE1/4;  
Sec. 31: Lots 8, 9, 11, 14, 17;  
Sec. 32: Lots 1 thru 4, inclusive, and 6 thru 9, inclusive, NE1/4 NE1/4, SE1/4 SW1/4, S1/2 SE1/4;  
Sec. 33: All  
Sec. 34: NE1/4, NE1/4 NW1/4, S1/2 NW1/4, SW1/4, NW1/4 SE1/4, NW1/4 NW1/4, NE1/4 SE1/4, SW1/4 SE1/4;  
Sec. 35: NW1/4 NE1/4, SE1/4 NE1/4, W1/2 NW1/4, N1/2 SW1/4, SE1/4 SW1/4, NE1/4 SE1/4, S1/2 SE1/4, NE1/4 NE1/4;  
Sec. 36: NE1/4 SE1/4, S1/2 SE1/4;

T. 5 N., R. 94 W.

- Sec. 1: Lots 5 thru 8, inclusive, S1/2 N1/2, S1/2;
- Sec. 2: Lots 5 thru 8, inclusive, S1/2 N1/2, S1/2;
- Sec. 3: Lots 5, 6, 7, 8, S1/2 NE1/4, N1/2 SE1/4, SE1/4 SE1/4, S1/2 NW1/4, SW1/4, SW1/4 SE1/4;
- Sec. 4: Lots 5, 6, 7, 8, S1/2 N1/2, SE1/4;
- Sec. 9: N1/2 NW1/4;
- Sec. 10: W1/2 NE1/4, NW1/4, S1/2, E1/2 NE1/4;
- Sec. 11: N1/2, S1/2;
- Sec. 12: W1/2, NW1/4 SE1/4, NE1/4, NE1/4 SE1/4, S1/2 SE1/4;
- Sec. 13: NE1/4, NW1/4, E1/2 SW1/4, N1/2 SE1/4, SE1/4 SE1/4;
- Sec. 24: NE1/4 NE1/4;

T. 6 N., R. 94 W.

- Sec. 3: S1/2 SW1/4;
- Sec. 7: Lots 7, 8, SE1/4 NE1/4, E1/2 SW1/4, SE1/4;
- Sec. 8: Lots 1, 3, S1/2 NE1/4, NW1/4, W1/2 SW1/4, NE1/4 SW1/4, N1/2 SE1/4;
- Sec. 9: Lots 1, 4, E1/2 NE1/4, N1/2 S1/2, W1/2 NE1/4, NW1/4;
- Sec. 10: Lot 1, NW1/4 NE1/4, S1/2 NE1/4, NW1/4, N1/2 SW1/4, SE1/4 SW1/4, SE1/4, NE1/4 NE1/4;
- Sec. 11: SW1/4 NW1/4, SW1/4, W1/2 SE1/4, S1/2 NE1/4, N1/2 NW1/4, SE1/4 NW1/4, E1/2 SE1/4;
- Sec. 13: W1/2 NE1/4, NE1/4 NW1/4, S1/2 NW1/4, SW1/4, NW1/4 NW1/4, W1/2 SE1/4;
- Sec. 14: Lot 1, NW1/4 NE1/4, S1/2 NE1/4, NW1/4, N1/2 SW1/4, SE1/4 SW1/4, SE1/4, NE1/4 NE1/4;
- Sec. 15: Lots 1, 3, 4, 6 NE1/4, E1/2 NW1/4, NE1/4 SW1/4, N1/2 SE1/4;
- Sec. 16: Lot 6;
- Sec. 17: Lots 3, 4, 5, 8;
- Sec. 18: Lots 5, 6, 7, 8, NE1/4, E1/2 NW1/4, E1/2 SW1/4, SE1/4;
- Sec. 19: Lots 5, 6, N1/2 NE1/4, SE1/4 NE1/4, NE1/4 NW1/4, E1/2 SE1/4;
- Sec. 20: Lots 2 thru 4, inclusive, NW1/4 NE1/4, S1/2 N1/2, SW1/4;
- Sec. 21: Lots 2, 4, 5, 7, SW1/4 NE1/4, S1/2 NW1/4, NE1/4 SW1/4, NW1/4 SE1/4, S1/2 SW1/4, SW1/4 SE1/4;
- Sec. 22: Lot 8;
- Sec. 23: Lots 1, 6, NE1/4, N1/2 SE1/4;
- Sec. 24: Lots 1, 3 SW1/4 NE1/4, NW1/4, N1/2 SW1/4, NW1/4 SE1/4, N1/2 NE1/4, SE1/4 NE1/4, NE1/4 SE1/4;
- Sec. 25: Lots 1, 10;
- Sec. 26: Lot 9;
- Sec. 27: Lots 2, 3, 5, 7, 8, NE1/4 NW1/4, S1/2 NW1/4, SW1/4;
- Sec. 28: Lot 2, NW1/4 NE1/4, SE1/4 NE1/4, N1/2 SE1/4, SE1/4 SE1/4, SW1/4 NE1/4, SW1/4 SE1/4;
- Sec. 29: NW1/4;
- Sec. 30: Lot 10, E1/2 NE1/4, SW1/4 NE1/4, NW1/4 SE1/4;
- Sec. 33: E1/2 E1/2, SW1/4 SE1/4, W1/2 NE1/4, SW1/4, NW1/4 SE1/4;
- Sec. 34: Lot 2, NW1/4 NE1/4, S1/2 NE1/4, NW1/4, S1/2;
- Sec. 35: Lot 1, N1/2 NE1/4, SE1/4 NE1/4, NE1/4 NW1/4, S1/2 NW1/4, SW1/4, SW1/4 SE1/4;
- Sec. 36: Lots 2 thru 6 inclusive;

T. 6 N., R. 95 W.

Sec. 12: SE1/4 SW1/4, NE1/4 SE1/4, S1/2 SE1/4;

Sec. 13: NE1/4, E1/2 NW1/4;

T. 6 N., R. 97 W.

Sec. 7: Lots 5, 6, 7, 8, 12, 14, 21, 22, 32, 34

Sec. 8: All

Sec. 17: All

Sec. 18: Lots 5, 6, 7, 8, 9, 11, S1/2 NE1/4, SE1/4 NW1/4, E1/2 SW1/4, SE1/4;

The above described public lands contain 36,195.27 acres. Approximately 33,900 acres, those withdrawn under PLO 3735, and PLO 3736, were left open to all forms of use and disposal (except under the mining laws), subject to the condition that such use or disposition would not be inconsistent with the reclamation laws, and the purposes for which the lands were withdrawn. All lands more than 300 feet away from the proposed high waterline were opened to the mining laws on August 11, 1965, under the same condition. The remaining lands were segregated against disposals under now repealed public land laws in order to prevent non-discretionary encumbrances which could adversely affect development of a reclamation project. The Bureau of Reclamation has found that the subject lands are no longer needed for reclamation purposes, and has applied for revocation of the above noted withdrawals.

## II. Savery-Pot Hook Reclamation Project\*

The following described public lands were withdrawn under Public Land Order 2632 (March 13, 1962):

### Sixth Principal Meridian, Colorado

T. 11 N., R. 89 W.

Sec: 4: Lots 6 and 7;

T. 12 N., R. 89 W.

Sec. 17: SW1/4 SW1/4;

Sec. 18: SE1/4 SE1/4;

Sec. 19: Lot 5;

Sec. 20: Lots 1 to 4 inclusive, 6 to 10 inclusive, 13 and 14;

Sec. 21: Lots 1 to 3 inclusive, 6 and 7;

Sec. 22: Lot 4;

Sec. 28: Lots 4, 6, and 8;

Sec. 29: Lots 1, 2, and 5 to 9 inclusive;

Sec. 30: Lots 13 and 20;

Sec. 32: Lots 1 to 3 inclusive;

Sec. 33: Lots 2, 4, 7, 13, and 16;

T. 12 N., R. 90 W.

Sec. 16: NE1/4 SE1/4 and S1/2 S1/2;



T. 11 N., R. 91 W.

Sec. 1: Lots 7 to 10 inclusive, 16 and 17;  
Sec. 2: Lots 13 to 16 inclusive, and 18 to 20 inclusive;  
Sec. 3: Lot 20;  
Sec. 4: Lots 5, 6, 9, 10, 11, 15, and 16;  
Sec. 5: Lots 5 to 20 inclusive;  
Sec. 6: Lots 8 to 18 inclusive, and 21 to 23 inclusive;  
Sec. 7: Lot 5;

T. 12 N., R. 91 W.

Sec. 19: Lots 5, 6, and 11 to 20 inclusive;  
Sec. 20: Lots 3, 10, 11, and 14;  
Sec. 29: Lots 4, 5, 12, and 13;  
Sec. 30: Lots 5 to 20 inclusive;  
Sec. 31: Lots 5 to 20 inclusive;  
Sec. 32: Lots 2, 3, 8, and 9;  
Sec. 35: Lots 3 to 6 inclusive, and 11 to 14 inclusive;

T. 11 N., R. 92 W.

Sec. 1: Lots 5 to 8 inclusive, S1/2 N1/2 and S1/2;  
Sec. 2: Lots 5 to 8 inclusive, S1/2 N1/2 and S1/2;  
Sec. 3: Lots 5 to 8 inclusive, S1/2 N1/2, NE1/4 SW1/4, N1/2 SE1/4 and SE1/4 SE1/4;  
Sec. 4: Lots 5 to 8 inclusive, S1/2 N1/2, N1/2 SW1/4 and NW1/4 SE1/4;  
Sec. 5: Lot 5;  
Sec. 11: E1/2 NE1/4, NW1/4 NE1/4, NW1/4, NW1/4 SW1/4, and NE1/4 SE1/4;  
Sec. 12: N1/2 NE1/4, SW1/4 NE1/4, NW1/4, NW1/4 SW1/4;

T. 12 N., R. 93 W.

Sec. 17: Lots 6 to 13 inclusive, and 16 to 23 inclusive;  
Sec. 18: Lots 1 to 4 inclusive, 7 to 10 inclusive, 12 to 18 inclusive, SW1/4 SE1/4;

T. 12 N., R. 94 W.

Sec. 13: Lots 2 and 4 inclusive, 7 to 9 inclusive;  
Sec. 14: Lots 1 and 5;

T. 6 N., R. 99 W.

Sec. 22: S1/2 SE1/4;  
Sec. 23: SW1/4 NE1/4, SE1/4 NW1/4 and NE1/4 SW1/4;  
Sec. 24: Lot 1, N1/2 NE1/4, SW1/4 NE1/4, and S1/2 NW1/4;  
Sec. 27: Lot 1;

The above described public lands contain 10,197.93 acres. They were segregated from all forms of location, entry, and disposal under the public land laws, including the mining laws, in order to prevent non-discretionary encumbrances which could adversely affect development of a reclamation project. The Bureau of Reclamation has found that the subject lands are no longer needed for reclamation purposes and has applied for revocation of this withdrawal.

III. Power Site Reserve 121 and 721, Power Site Classifications 87, 93, and 355

The following described lands were withdrawn under Secretarial and Executive Orders for power-related purposes:

Sixth Principal Meridian, Colorado

T. 7 N., R. 84 W.

Sec. 6: SW1/4 NE1/4, SE1/4 NW1/4, Lots 1, 2, 6;

T. 8 N., R. 84 W.

Sec. 15: W1/2 SW1/4, SE1/4 SW1/4;  
Sec. 16: SE1/4;  
Sec. 20: SE1/4 NE1/4, E1/2 SE1/4;  
Sec. 21: N1/2 NE1/4, NW1/4, S1/2;  
Sec. 22: SW1/4 SW1/4;  
Sec. 27: W1/2 NW1/4;  
Sec. 28: N1/2 NE1/4, SE1/4 NE1/4, N1/2 NW1/4;  
Sec. 29: NE1/4, E1/2 SW1/4, W1/2 SE1/4;  
Sec. 31: S1/2 NE1/4, SE1/4;  
Sec. 32: NW1/4 NE1/4, NW1/4;

T. 9 N., R. 84 W.

Sec. 5: N1/2 SW1/4, W1/2 SW1/4 SW1/4;  
Sec. 7: N1/2 NE1/4, SW1/4 NE1/4, W1/2 SE1/4, Lots 8, 9, 12;  
Sec. 8: Lots 7, 8, 11, 12, 13;  
Sec. 9: E1/2 NW1/4, Lots 3, 4, 5, 6, 9, and 10;  
Sec. 17: Lots 8 thru 12;  
Sec. 18: Lots 15, 17 thru 23, Tract 43;

T. 10 N., R. 84 W.,

Sec. 14: S1/2 S1/2;  
Sec. 15: S1/2 SE1/4;  
Sec. 16: S1/2 SW1/4;  
Sec. 19: S1/2 S1/2;  
Sec. 20: SE1/4 NE1/4, S1/2 SW1/4, SE1/4;  
Sec. 21: W1/2 NW1/4, SW1/4, N1/2 SE1/4;  
Sec. 22: N1/2 NE1/4, NW1/4, NW1/4 SW1/4;  
Sec. 28: NW1/4 NW1/4;  
Sec. 29: N1/2 N1/2;  
Sec. 30: N1/2 N1/2;

T. 11 N., R. 84 W.

Sec. 18: W1/2 SW1/4;  
Sec. 19: W1/2 NW1/4;

T. 12 N., R. 84 W.

Secs. 16, 17, and 21: M & B;

T. 7 N., R. 85 W.

Sec. 1: E1/2 SW1/4, SE 1/4;

T. 9 N. R. 85 W.

Sec. 3: SW1/4NW1/4, SW1/4, S1/2 SE1/4;  
Sec. 4: NE1/4 SE1/4, Lots 10, 11, 12, 13, 15, 18, 19;  
Sec. 5: Lot 5, A, B, C, D, E;  
  
Sec. 10: E1/2 NE 1/4, NE1/4 SE1/4, Lot 1;  
Sec. 11: SW1/4, SW1/4 SE1/4;  
Sec. 13: Lots 1 thru 6;  
Sec. 14: SE1/4 NE1/4, Lots 1, 2, 4, 5, 6, 10;

T. 10 N., R. 85 W.

Sec. 24: S1/2 SE1/4;  
Sec. 25: N1/2 N1/2;  
Sec. 32: Lots 12, 13;

T. 11 N., R. 85 W.

Sec. 3: SW1/4 NW1/4, W1/2 SW1/4, SE1/4 SW1/4;  
Sec. 4: S1/2 NE1/4, NE1/4 SE1/4, Lots 5 thru 8;  
Sec. 5: Lot 5;  
Sec. 10: E1/2 NW1/4, NE1/4SW1/4, W1/2 SE1/4, SE1/4 SE1/4;  
Sec. 13: W1/2 NW1/4, S1/2;  
Sec. 14: N1/2, E1/2 SE1/4;  
Sec. 23: W1/2 NE1/4, SE1/4, Lots 1, 2;  
Sec. 24: NE1/4, NE1/4 SW1/4, S1/2 SW1/4, SE1/4, Lots 1 thru 4;  
Sec. 25: NE1/4 NE1/4, W1/2 NE1/4, NW1/4;  
Sec. 26: NE1/4 NE1/4, S1/2 NE1/4, W1/2 SE1/4;  
Sec. 35: NW1/4 NE1/4;

T. 12 N., R. 85 W.

Sec. 31: SW1/4 NE1/4, NW1/4, NE1/4 SW1/4, N1/2 SE1/4;  
Sec. 32: SW1/4, W1/2 SE1/4;

T. 12. N., R. 86 W.

Sec. 36: E1/2 NE1/4;

T. 5 N., R. 92 W.

Sec. 1: Lot 8, SW1/4 NW1/4, SW1/4;  
Sec. 2: Lots 8, 13;  
Sec. 3: Lots 13, 15, 17, SE1/4 SE1/4;  
Sec. 4: Lot 9, S1/2 SW1/4, SW1/4 SE1/4;  
Sec. 5: Lot 11, S1/2 SE1/4;  
Sec. 6: Lots 10 thru 14, 19;  
Sec. 7: Lots 5, 9, 10, 13, 14, NW1/4 NE1/4, NE1/4 NW1/4;  
Sec. 8: Lots 1, 2, N1/2 N1/2, SE1/4 NE1/4, SE1/4 NW1/4, NE1/4 SW1/4, S1/2 SW1/4;  
Sec.. 9: Lots 2, 3, NW1/4;  
Sec. 10: Lot 1;  
Sec. 11: Lots 1, 6  
Sec. 12: NW1/4  
Sec. 17: W1/2 NW1/4, NW1/4 SW1/4;  
Sec. 18: N1/2 NE1/4, SE1/4, NE1/4, NE1/4 SE1/4;

T. 6 N., R. 92 W.

Sec. 31: Lots 7, 8, E1/2 SW1/4, NE1/4 SE1/4, W1/2 SE1/4;  
Sec. 34: Lot 1;  
Sec. 35: Lot 1;  
Sec. 36: SE1/4 SW1/4;

T. 5 N., R. 93 W.

Sec. 1: W1/2 SW1/4;  
Sec. 2: Lot 9, E1/2 SE1/4;  
Sec. 4: Lot 5, SW1/4 SW1/4;  
  
Sec. 5: Lots 6, 7, 8, SW1/4 NE1/4, S1/2 NW1/4, NE1/4, SW1/4, S1/2 SW1/4, SE1/4;  
Sec. 6: Lots 8, 9, 10, 11, 12, 13, SE1/4 NW1/4, NE1/4 SW1/4, SE1/4;  
Sec. 7: NE1/4, SE1/4 NW1/4, NE1/4 SW1/4, N1/2 SE1/4;  
Sec. 8: N1/2 N1/2, SE1/4 NW1/4;  
Sec. 9: SW1/4 NE1/4, NW1/4, N1/2 SW1/4, SW1/4 SW1/4, W1/2 SE1/4, SE1/4 SE1/4;  
Sec. 61: N1/2 NE1/4, SE1/4 NE1/4;

T. 6 N., R. 93 W.

Sec. 15: NE1/4 SW1/4, S1/2 SW1/4;  
Sec. 20: SE1/4 SW1/4, S1/2 SE1/4;  
Sec. 21: NE1/4 NE1/4, S1/2 NE1/4, S1/2;  
Sec. 22: N1/2 NW1/4, SW1/4 NW1/4;  
Sec. 25: SW1/4 NE1/4;  
Sec. 26: SE1/4 NE1/4, S1/2 SW1/4, N1/2 SE1/4, SW1/4 SE1/4;  
Sec. 27: SE1/4 SE1/4;  
Sec. 28: Lots 1, 3, W1/2 NE1/4, N1/2 NE1/4, S1/2 S1/2;  
Sec. 29: Lots 1, 2, 4 thru 7, N1/2 NE1/4, NW1/4, N1/2 SW1/4, SW1/4, SW1/4;  
Sec. 30: Lots 6, 7, 8, 10, 13, 14, NE1/4 NE1/4, S1/2 NE1/4, N1/2 SE1/4;  
Sec. 31: Lots 8, 9, 11, 14 17;  
Sec. 32: Lots 1 thru 7, 9, NE1/4 NE1/4, SE1/4 SW1/4;  
Sec. 33: N1/2, N1/2 SW1/4, SE1/4;  
Sec. 34: NE1/4, NE1/4 NW1/4, S1/2 NW1/4, SW1/4, NW1/4, SE1/4;  
Sec. 35: NW1/4 NE1/4, SE1/4 NE1/4, W1/2 NW1/4, NE1/4 SW1/4, NE1/4 SE1/4, S1/2 SE1/4;  
Sec. 36: NE1/4 SE1/4, S1/2 SE1/4;

T. 5 N., R. 94 W.

Sec. 1: S1/2 N1/2, N1/2 SE1/4, Lots 5 thru 8;  
Sec. 2: S1/2 N1/2, E1/2 SW1/4, N1/2 SE1/4, SW1/4 SE1/4, Lots 5, 6;  
Sec. 3: S1/2 NE1/4, SE1/4 NW1/4, NE1/4 SW1/4, NW1/4 SE1/4, Lot 5;  
Sec. 4: SW1/4 NE1/4, SE1/4 NW1/4, Lots 5, 6, 7;  
Sec. 11: NE1/4 NE1/4;

T. 6 N., R. 94 W.

- Sec. 7: SE1/4 SE1/4;
- Sec. 8: SE1/4 NE1/4, SE1/4 NW1/4, N1/2 SW1/4, SW1/4 SW1/4, N1/2 SE1/4, Lots 1, 3;
- Sec. 9: SE1/4 NE1/4, SW1/4 NW1/4, NE1/4 SW1/4, N1/2 SE1/4, Lots 1, 4;
- Sec. 10: S1/2 NW1/4, N1/2 SW1/4, SE1/4 SW1/4, NE1/4 SE1/4, S1/2 SE1/4, Lot 1;
- Sec. 11: SW1/4 SE1/4;
- Sec. 13: SW1/4 SW1/4;
- Sec. 14: W1/2 NE1/4, NE1/4 NW1/4, S1/2 NW1/4, N1/2 SW1/4, SE1/4 SW1/4, W1/2 SE1/4, SE1/4 SE1/4, Lot 1;
- Sec. 15: Lots 1, 3, 4, 6, NE1/4, E1/2 NW1/4, NE1/4 SW1/4, N1/2 SE1/4;
- Sec. 16: Lot 6;
- Sec. 17: Lots 3, 4, 5 8;
- Sec. 18: NE1/4 NE1/4, S1/2 NE1/4, SE1/4 NW1/4, NE1/4 SW1/4, N1/2 SE1/4, Lot 6;
- Sec. 19: SE1/4 NE1/4, E1/2 SE1/4;
- Sec. 20: W1/2 NE1/4, SE1/4 NE1/4, S1/2 NW1/4, SW1/4, Lots 2, 3, 4;
- Sec. 21: SW 1/4 NE1/4, S1/2 NW1/4, NW1/4 SE1/4, Lots 2, 4, 5, 7;
- Sec. 22: Lot 8;
- Sec. 23: NE1/4, N1/2 SE1/4, Lots 1, 3, 6;
- Sec. 24: S1/2 NW1/4, N1/2 SW1/4, N1/2 SE1/4, Lots 1, 3;
- Sec. 25: Lots 1, 10;
- Sec. 26: Lot 9;
- Sec. 27: Lots 2, 3, 5, 7, 8, NE1/4 NW1/4, S1/2 NW1/4, SW1/4;
- Sec. 29: NW1/4 NW1/4;
- Sec. 30: NE1/4 NE1/4;
- Sec. 33: E1/2 NE1/4, NE1/4 SE1/4, S1/2 SE1/4;
- Sec. 34: NW1/4 SE1/4, S1/2 NE1/4, NW1/4, S1/2, Lot 2
- Sec. 35: N1/2 NE1/4, SE1/4 NE1/4, NE1/4 NW1/4, S1/2 NW1/4, SW1/4 SW1/4 SE1/4, Lot 1;
- Sec. 36: Lots 2 thru 6;

T. 6 N., R. 95 W.

- Sec. 2: Lot 15;
- Sec. 11: Lots 3, 5;
- Sec. 12: SW1/4 SE1/4, Lots 7, 8;
- Sec. 13: N1/2 NE1/4, SE1/4 NE1/4;

T. 7 N., R., 95 W.

- Sec. 18: Lot 8;
- Sec. 19: Lots 5, 6, 10;
- Sec. 35: Lots 7 thru 11, 15, 16;

T. 7 N., R. 96 W.

- Sec. 17: Lots 13, 19, 30;
- Sec. 19: Lots 9, 20, 26;
- Sec. 23: Lot 4;

T. 6 N., R. 97 W.

- Sec. 7: Lots 5 thru 8, 11;

T. 6 N., R. 98 W.

- Sec. 13: NE1/4, S1/2 NW1/4, SW1/4, W1/2 SE1/4;
- Sec. 14: N1/2 NE1/4, NW1/4, N1/2 SW1/4, SW1/4 SW1/4
- Sec. 22: SE1/4 NE1/4, SE1/4 SE1/4;
- Sec. 23: N1/2 NE1/4, SW1/4 NE1/4, NE1/4 NW1/4, S1/2 NW1/4, SW1/4;

T. 9 N., R. 102 W.

- Sec. 2: W1/2 SW1/4, SE1/4 SW1/4, Lots 7, 16, 17;
- Sec. 3: S1/2, Lots 6, 7, 8, 14, 17, 18, 21;
- Sec. 4: S1/2 N1/2, N1/2 S1/2, SW1/4 SW1/4, Lots 5 thru 8;
- Sec. 5: Lots 5, 6, 8, 22 thru 28, 42, 43, 44;
- Sec. 6: SE1/4 NW1/4, E1/2 SW1/4, Lots 8 thru 15, 22, 27, 29, 30;
- Sec. 7: NW1/4 NE1/4, S1/2 NE1/4, E1/2 W1/2, SE1/4, Lot 10;
- Sec. 8: SE1/4 NE1/4, S1/2 S1/2, NE1/4 SE1/4, Lots 1 thru 4, 12, 16, 17, 20, 22;
- Sec. 9: W1/2 W1/2;
- Sec. 10: E1/2 NE1/4;
- Sec. 11: NW1/4;
- Sec. 21: S1/2 NE1/4, SE1/4, Lots 2, 4;
- Sec. 22: SW1/4 NE1/4, SE1/4 NW1/4, N1/2 SW1/4, NW1/4 SE1/4, Lots 1, 4;
- Sec. 28: NE1/4;

T. 10 N., R. 102 W.

- Sec. 17: Lots 5, 7;
- Sec. 18: SW1/4 NE1/4, SE1/4 NW1/4, E1/2 SW1/4, N1/2 SE1/4, SW1/4 SE1/4, Lots 6 thru 9;
- Sec. 19: W1/2 NE1/4, SE1/4 NE1/4, NE1/4 NW1/4, N1/2 SE1/4, Lots 5, 6, 7, 10, 12, 14, 22, 23, 25;
- Sec. 20: NE1/4 NE1/4, S1/2 N1/2, S1/2, Lots 1, 4, 6;
- Sec. 28: S1/2 NW1/4, SW1/4;
- Sec. 30: NE1/4 SE1/4, Lots 9, 25, 27, 28, 40, 42;
- Sec. 31: Lots 9, 43, 45
- Sec. 32: NW1/4 NE1/4, SE1/4 SE1/4, Lots 1, 3, 5, 11, 13, 15, 18, 20, 22, 28, 30, 31;
- Sec. 33: NE1/4, E1/2 W1/2, SW1/4 SW1/4, Lots 1, 4, 5, 7, 9;
- Sec. 34: NE1/4 SW1/4, W1/2 SE1/4, Lots 1, 4, 5, 8, 10;

T. 9 N., R. 103 W.

- Sec. 1: Lot 5

T. 10 N., R. 103 W.

- Sec. 6: Lots 13, 14, 25, 28;
- Sec. 7: Lots 6, 7, 8, 9, 14;
- Sec. 8: N1/2 NE1/4, SW1/4 NE1/4, E1/2 NW1/4, SW1/4, Lots 1, 4, 5, 7, 10;
- Sec. 9: E1/2 SE1/4, Lots 1, 4, 6, 8, 14, 17, 19;
- Sec. 10: All
- Sec. 13: S1/2 N1/2, S1/2;
- Sec. 14: N1/2, N1/2 SW1/4, SE1/4, Lots 1, 3;
- Sec. 15: N1/2 NE1/4, SE1/4 NE1/4, Lots 1, 3, 7, 9, 11, 13, 22, 24, 27;
- Sec. 16: W1/2 W1/2, Lots 1, 3, 5, 7, 14, 15;
- Sec. 17: SE1/4 NE1/4, W1/2 NW1/4, S1/2, Lots 1, 4, 5, 7, 9, 12;

Sec. 18: E1/2, E1/2 NW1/4, NE1/4 SW1/4, Lots 5, 6, 7;  
 Sec. 19: NE1/4 NE1/4;  
 Sec. 20: NE1/4, N1/2 NW1/4;  
 Sec. 21: SW1/4 NE1/4, W1/2 NW1/4, SE1/4 NW1/4, S1/2, Lots 3, 5, 7, 8;  
 Sec. 22: SW1/4 SW1/4, Lots 5, 7, 13, 28, 30, 31, 34, 36;  
 Sec. 23: NE1/4, Lots 1, 9, 10, 12, 14;  
 Sec. 24: N1/2, Lots 1, 4, 6, 9;  
 Sec. 25: Lots 25, 26  
 Sec. 26: SW1/4, W1/2 SE1/4, SE1/4 SE1/4, Lots 10, 11, 14, 17, 19, 22;  
 Sec. 27: W1/2 NE1/4, SE1/4 NE1/4, NW1/4, N1/2 S1/2, SE1/4 SE1/4, Lot 2;  
 Sec. 28: N1/2 N1/2;  
 Sec. 35: N1/2 NE1/4;  
 Sec. 36: Lots 9, 10, 19;

T. 10 N., R. 104 W.

Sec. 12: NE1/4 NW1/4, Lots 1 thru 5, 10, 12, 22, 23, 28, 29, 31, 34;  
 Sec. 13: E1/2 SW1/4, SE1/4, Lots 1, 2, 5, 12, 16, 18, 20;

The above described lands contain 45,995 acres. These lands are reserved from entry location, or other disposal, only under the non-mineral public land laws, in order to prevent non-discretionary encumbrances which could adversely affect power-related developments (mining locations are allowed, subject to Section 24 of the Federal Power Act.

#### IV. Coal Classifications/Withdrawals\*

Approximately 1,340,000 acres of land in the resource area are classified and/or withdrawn as coal land of this, less that 20 percent is federally-owned surface (approximately 255,000 acres). Lands within the following townships are affected (all Sixth Principle Meridian, Colorado):

T. 4 N., R. 85 W.  
 T. 5 N., R. 85 W.  
 T. 3 N., R. 86 W.  
 T. 4 N., R. 86 W.  
 T. 6 N., R. 86 W.  
 T. 7 N., R. 86 W.  
 T. 8 N., R. 86 W.  
 T. 9 N., R. 86 W.  
 T. 3 N., R. 87 W.  
 T. 4 N., R. 87 W.  
 T. 5 N., R. 87 W.  
 T. 6 N., R. 87 W.  
 T. 7 N., R. 87 W.  
 T. 8 N., R. 87 W.  
 T. 10 N., R. 87 W.  
 T. 11 N., R. 87 W.  
 T. 12 N., R. 87 W.  
 T. 3 N., R. 88 W.  
 T. 4 N., R. 88 W.

T. 3 N., R. 89 W.  
 T. 4 N., R. 89 W.  
 T. 5 N., R. 89 W.  
 T. 7 N., R. 89 W.  
 T. 8 N., R. 89 W.  
 T. 9 N., R. 89 W.  
 T. 10 N., R. 89 W.  
 T. 11 N., R. 89 W.  
 T. 12 N., R. 89 W.  
 T. 3 N., R. 90 W.  
 T. 4 N., R. 90 W.  
 T. 5 N., R. 90 W.  
 T. 6 N., R. 90 W.  
 T. 7 N., R. 90 W.  
 T. 8 N., R. 90 W.  
 T. 9 N., R. 90 W.  
 T. 10 N., R. 90 W.  
 T. 11 N., R. 90 W.  
 T. 12 N., R. 90 W.

T. 5 N., R. 88 W.  
T. 6 N., R. 88 W.  
T. 7 N., R. 88 W.  
T. 8 N., R. 88 W.  
T. 9 N., R. 88 W.  
T. 10 N., R. 88 W.  
T. 11 N., R. 88 W.  
T. 12 N., R. 88 W.

T. 3 N., R. 91 W.  
T. 4 N., R. 91 W.  
T. 5 N., R. 91 W.  
T. 6 N., R. 91 W.  
T. 7 N., R. 91 W.  
T. 8 N., R. 91 W.  
T. 9 N., R. 91 W.  
T. 10 N., R. 91 W.  
T. 12 N., R. 91 W.

T. 3 N., R. 92 W.  
T. 4 N., R. 92 W.  
T. 5 N., R. 92 W.  
T. 6 N., R. 92 W.  
T. 7 N., R. 92 W.  
T. 8 N., R. 92 W.  
T. 9 N., R. 92 W.  
T. 10 N., R. 92 W.  
T. 3 N., R. 93 W.  
T. 4 N., R. 93 W.  
T. 5 N., R. 93 W.  
T. 6 N., R. 93 W.  
T. 7 N., R. 93 W.  
T. 8 N., R. 93 W.  
T. 9 N., R. 93 W.  
T. 3 N., R. 94 W.  
T. 4 N., R. 94 W.  
T. 6 N., R. 94 W.  
T. 7 N., R. 94 W.  
T. 8 N., R. 94 W.  
T. 9 N., R. 94 W.  
T. 3 N., R. 95 W.  
T. 4 N., R. 95 W.  
T. 5 N., R. 95 W.  
T. 7 N., R. 95 W.  
T. 8 N., R. 95 W.  
T. 9 N., R. 95 W.  
T. 4 N., R. 96 W.  
T. 5 N., R. 96 W.  
T. 7 N., R. 96 W.  
T. 8 N., R. 96 W.  
T. 3 N., R. 97 W.  
T. 4 N., R. 97 W.  
T. 5 N., R. 97 W.  
T. 3 N., R. 98 W.  
T. 4 N., R. 98 W.  
T. 5 N., R. 98 W.

Those lands withdrawn were segregated from location, sale or entry (except location of metaliferous minerals) in order to prevent non-discretionary disposals/encumbrances from interfering with coal leasing.



V. Classifications under the Classification and Multiple Use Act of 1964\*\*

Under authority of the Classification and Multiple Use Act of September 19, 1964 (78 Stat. 986), the best blocked public land areas of this RMP were classified, on an interim basis as provided by the act, for multiple use management by the following Notices of Classification:

	<u>Date</u>	<u>Acres</u>	<u>Federal Register</u>
C-1018	4/10/1967	1,104,320	4/20/1967 p. 6215-17
C-9815	8/13/1970	51,002	8/21/1970 p. 13396-98

Sixth Principal Meridian, Colorado

T. 4 N., R. 84 W.

Sec. 17: SE1/4 SW1/4 and S1/2 SE1/4;  
Sec. 20: NE1/4, NE1/4 NW1/4, S1/2 SW1/4, and N1/2 SE1/4;  
Sec. 21: SW1/4 NW1/4 and W1/2 SW1/4;  
Sec. 28: NE1/4 NW1/4 and SE1/4 SE1/4;  
Sec. 29: NW1/4;  
Sec. 32: NW1/4 NE1/4 and E1/2 E1/2;  
Sec. 33:

T. 5 N., R. 84 W.

Sec 34: E1/2 SE1/4;

T. 6 N., R. 84 W.

Sec. 27: SE1/4 SE1/4;

T. 7 N., R. 84 W.

Sec. 29: W1/2 W1/2  
Sec. 30: E1/2 NE1/4;  
Sec. 33: SE1/4 NE1/4;

T. 2 N., R. 85 W.

Sec. 8: S1/2 SW1/4;  
Sec. 17: N1/2 NW1/4, SW1/4 NW1/4;  
Sec. 18: Lots 2, 3, and 4, NE1/4, SE1/4 NW1/4, E1/2 SW1/4, and NW1/4 SE1/4;  
Sec. 19: Lot 1, NW1/4 NE1/4, and NE1/4 NW1/4;  
Sec. 35: S1/2 NE1/4, NE1/4 NW1/4, S1/2 NW1/4, and N1/2 SW1/4;

T. 3 N., R. 85 W.

Sec. 1: Lots 10 and 11;  
Sec. 2: Lots 5, 6, 7, and 8;  
Sec. 7: Lot 10;  
Sec. 11: Lots 1, 2, 4, and 5;  
Sec. 12: Lots 3, 4, 5, 6, 11, 12, 13, and 14;

T. 4 N., R. 85 W.

Sec. 18: Lot 2;

T. 5. N., R. 85 W.

Sec. 19: Lots 7 thru 12, inclusive;  
Sec. 20: Lots 5 and 16;  
Sec. 30: Lot 6;  
Tract 142;

T. 7 N., R. 85 W.

Sec. 18: Lots 1, 2, 3, and 4, W1/2 E1/2 and E1/2 W1/2;  
Sec. 19: Lots 1, 2, and 3;

T. 8 N., R. 85 W.

Sec. 5: Lots 5, 6, 7, and 8;  
Sec. 6:  
Sec. 9: Lots 1, 2, 3, and 4, NE1/4 SE1/4 and S1/2 SE1/4;

T. 10. N., R. 85 W

Sec. 26: Lot 19;  
Sec. 20: Lots 15 and 18;  
Sec. 21: Lots 13 and 14;

T. 2 N., R. 86 W.

Sec. 3: S1/2 SW1/4 and W1/2 SW1/4 SE1/4;  
Sec. 12: S1/2 SE1/4;  
Sec. 13: N1/2 N1/2 NE1/4 NE1/4, NW1/4 NW1/4 NE1/4, N1/2 NE1/4  
NW1/4 NE1/4, SW1/4 NW1/4 NE1/4, N1/2 NW1/4 SW1/4 NE1/4,  
NE1/4 NW1/4, N1/2 NE1/4 SE1/4 NW1/4, W1/2 SE1/4 NW1/4,  
S1/2 NE1/4 NE1/4 SW1/4, NW1/4 NE1/4 SW1/4, S1/2 NE1/4  
SW1/4, NW1/4 SW1/4, S1/2 SW1/4, S1/2 N1/2 N1/2 SE1/4,  
S1/2 N1/2 SE1/4, and S1/2 SE1/4;  
Sec. 24: N1/2;

T. 3 N., R. 86 W.

Sec. 6: Lots 9 thru 14, inclusive, and lots 17 thru 23,  
inclusive;  
Sec. 7: Lots 14, 15, and 16;  
Sec. 12: Lots 9, 15, and 16;  
Sec. 13: Lots 2 and 3;

T. 4 N., R. 86 W.

Sec. 9: Lot 3;  
Sec. 10: S1/2 SE1/4;  
Sec. 11: Lots 8, 11, 17, and 19;  
Sec. 13: SE1/4 NE1/4;  
Sec. 14: Lots 4, 5, 6, 8, and 12;  
Sec. 15: NE1/4, W1/2 SW1/4;  
Sec. 17: SE1/4 SW1/4;  
Sec. 22: NE1/2, N1/2 NW1/4;  
Sec. 23: NE1/4 NE1/4, NW1/4 NW1/4, S1/2 N1/2, N1/2 S1/2, SE1/4  
SW1/4, and SW1/4 SE1/4;  
Sec. 24: E1/2 SW1/4 and NW1/4 SE1/4;  
Sec. 25: NE1/4 NW1/4;  
Sec. 26: NW1/4 NE1/4 and N1/2 NW1/4;  
Sec. 27: S1/2 NE1/4, NE1/4 NW1/4, S1/2 NW1/4, and SW1/4;  
Sec. 28: SE1/4 SE1/4;  
Sec. 31: Lots 9, 16, and 17;  
Sec. 33: NE1/4 NE1/4;

T. 5 N., R. 86 W.

Sec. 33: NW1/4 NE1/4 and SE1/4 SE1/4;  
Sec. 34: SW1/4 SW1/4;  
Sec. 35: NE1/4 and S1/2;

T. 7 N., R. 86 W.

Sec. 12: Lots 1, 2, 3, and 4;  
Sec. 13: Lots 1, 2, 3, and 4, and W1/2 E1/2;

Sec. 16: Lots 1, 2, 3, and 4;  
Sec. 17: Lot 7, and SE1/4  
Sec. 20: NE1/4;  
Sec. 21: N1/2;  
Sec. 22: Lots 1, 2, 3, 4, 5, and 6, S1/2 NW1/4, and N1/2 SW1/4;  
Sec. 24: Lots 1, 2, 3, 4, and 11;  
Sec. 25: Lot 1;

T. 8 N., R. 86 W.

Sec. 4: Lots 12 and 13;  
Sec. 5: Lots 5, 6, 7 and 8;  
Sec. 7: Lot 5;  
Sec. 8: Lots 1 thru 9, inclusive and N1/2 NE1/4;  
Sec. 9: Lots 3 and 4;  
Sec. 17: Lots 1, 2, 3, 4, 5, and 6;  
Tracts: 61A, 61B, 61C, 64A, 64B, and 64C;

T. 10 N., R. 86 W.

Sec. 23: N1/2 NE1/4 and SW1/4 NE1/4;  
Sec. 36: SW1/4 SE1/4;

T. 3 N., R. 87 W.

Sec. 1: Lots 1, 8, 9, 12, 13, and 14;

T. 4 N., R. 87 W.

Sec. 35: E1/2;  
Sec. 36:

T. 5 N., R. 87 W.

Sec. 17: NE1/4 SE1/4 and W1/2 SW1/4;  
Sec. 18: NE1/4 SE1/4 and S1/2 SE1/4;  
Sec. 19: W1/2 NW1/4;  
Sec. 29: W1/2 NW1/4;  
Sec. 30: E1/2 NE1/4;

T. 6 N., R. 87 W.

Sec. 2: NE1/4 SE1/4;

T. 8 N., R. 87 W.

Sec. 19: Lot 2 and SE1/4 NW1/4;  
Sec. 28: E1/2 SE1/4;  
Sec. 34: N1/2;

T. 3 N., R. 88 W.

Sec. 8: SW1/4 SW1/4 and SE1/4 SE1/4;  
Sec. 17: Lots 1 to 6, inclusive, and SW1/4 NE1/4 and SE1/4 NW1/4;

T. 4 N., R. 88 W.

Sec. 7: Lots 2, 3, 4, 5, and 6, NE1/4 SW1/4, and S1/2 SE1/4;  
Sec. 17: NW1/4, and N1/2 SW1/4;  
Sec. 18: NE1/4, SE1/4 NW1/4, NE1/4 SW1/4, and N1/2 SE1/4;

T. 5 N., R. 88 W.

Sec. 1: Lot 7, SE1/4 NW1/4, and SW1/4;  
Sec. 2: SE1/4 NE1/4, NE1/4 SE1/4, and S1/2 SE1/4;  
Sec. 3: Lot 5, SW1/4 NE1/4, and W1/2 SE1/4;  
Sec. 11: NE1/4 and S1/2;  
Sec. 24: E1/2 NE1/4;  
Sec. 31: Lots 7 and 8;  
Sec. 35: Lot 4;

T. 8 N., R. 88 W.

Sec. 6: Lots 9, 10, 11, 12, 13, 17, and 18;  
Sec. 7: Lots 9, 11, 12, 13, and 14;  
Sec. 8: Lots 2, 4, 5, 10, and 11;  
Sec. 23: Lots 1, 2, and 7;  
Sec. 24: Lots 1 thru 10, inclusive;  
Tracts: 59A, 59B, 59C, and 59D, 70B, 82G, 82H, 82I, 82J, 82O,  
82P, 83A 83B, 83G, 83H, 83I, 83J, 83K, 83L, and 83P;

T. 9 N., R. 88 W.

Sec. 31: Lots 9 thru 15, inclusive;

T. 3 N., R. 89 W.

Sec. 4:  
Sec. 5: Lots 5, 6, 7, 8, and 10  
Sec. 6: Lot 10;  
Sec. 8: Lots 1, 6, and 8, and E1/2 SE1/4;  
Sec. 18: Lot 8, SE1/4 SW1/4, and S1/2 SE1/4;

T. 4 N., R. 89 W.

Sec. 10: Lots 1, 2, 3, and 4;

T. 5 N., R. 89 W.

Sec. 27: SE1/4 NW1/4, SW1/4, and NW1/4 SE1/4;  
Sec. 28: S1/2 SE1/4;  
Sec. 29: SW1/4 and W1/2 SE1/4;  
Sec. 30: Lots 1, 2, 3, and 4, SE1/4 NW1/4, E1/2 SW1/4, and SE1/4;  
Sec. 31: NE1/4 NE1/4;  
Sec. 32: N1/2, SW1/4, and N1/2 SE1/4;  
Sec. 33:  
Sec. 34: W1/2 and W1/2 SE1/4;

Those public lands within the following:

T. 11 N., R. 91 W.

Secs. 4 to 9, inclusive;  
Secs. 16 to 21, inclusive;  
Secs. 28 to 33, inclusive;

T. 12 N., R. 91 W.

Secs. 13 to 17, inclusive;  
Sec. 19, S1/2;  
Secs. 20 to 35, inclusive;

- T. 11 N., R. 92 W.  
Secs. 1 to 26, inclusive;  
Secs. 35 and 36;
- T. 11 N., R. 93 W.  
Secs. 1 to 18, inclusive;  
Secs. 20 to 24, inclusive;
- T. 12 N., R. 93 W.  
Secs. 15 to 22, inclusive;  
Secs. 27 to 34, inclusive;
- T. 11 N., R. 94 W.  
Secs. 1 to 20, inclusive;
- T. 12 N., R. 94 W.
- T. 11 N., R. 95 W.  
Secs. 1 to 16 inclusive;  
Sec. 17: Lots 18 and 19;  
Sec. 18:  
Sec. 21: Lots 1, 14, 15, 16 and 25;  
Secs. 22 to 24, inclusive;  
Sec. 26: W1/2  
Sec. 27:  
Sec. 32:  
Sec. 34:  
Sec. 35: W1/2;
- T. 12 N., R. 95 W.
- T. 6 N., R. 96 W.  
Secs. 5 to 8, inclusive;  
Secs. 17 to 20, inclusive;  
Secs. 29 to 32, inclusive;
- T. 7 N., R. 96 W.  
Secs. 1 to 12, inclusive;  
Secs. 15 to 22, inclusive;  
Secs. 27 to 34, inclusive;
- T. 8 and 9 N., R. 96 W.
- T. 10 N., R. 96 W.  
Sec. 7: SW1/4, and W1/2 SE1/4;  
Sec. 18: W1/2, and W1/2 E1/2;  
Secs. 19 to 22, inclusive;  
Secs. 27 to 34, inclusive;
- T. 11 N., R. 96 W.  
Secs. 1 to 12, inclusive;  
Sec. 17: W1/2;  
Secs. 18 and 19:  
Sec. 20: W1/2;

T. 12 N., R. 97 W.

T. 3 N., R. 97 W.

Secs. 5 to 8, inclusive;

T. 4 N., R. 97 W.

Secs. 25 to 36, inclusive;

T. 6 to 12 N., R. 97 W.

T. 3 N., R. 98 W.

Secs. 1 to 4, inclusive;

T. 4 N., R. 98 W.

Secs. 11 to 15, inclusive;

Secs. 20 to 27, inclusive;

Secs. 33 to 36, inclusive;

T. 5 N., R. 98 W.

Secs. 2 to 11, inclusive;

Secs. 14 to 23, inclusive;

T. 6 to 12 N., R. 98 W.

T. 5 N., R. 99 W.

Secs. 1 to 24, inclusive;

T. 6 N., R. 99 W.

Secs. 1 to 6, inclusive;

Sec. 8: E1/2;

Secs. 9 to 16, inclusive;

Sec. 17: NE1/4;

Sec. 22: N1/2 and SE1/4;

Secs. 23 to 26, inclusive;

Sec. 27: NE1/4, and S1/2;

Sec. 28: S1/2;

Sec. 29: SE1/4;

Sec. 31: S1/2;

Sec. 32: NE1/4, and S1/2;

Secs. 33 to 36, inclusive;

T. 7 to 12 N., R. 99 W.

T. 6 N., R. 100 W.

Secs. 1 to 5, inclusive;

Sec. 6: N1/2;

T. 7 to 12 N., R. 100 W.

T. 6 N., R. 101 W.

Sec. 1: N1/2;

Sec. 2: N1/2;

T. 7 N., R. 101 W.  
Secs. 1 to 27, inclusive;  
Sec. 28: N1/2;  
Sec. 29: N1/2;  
Sec. 30: N1/2;  
Sec. 34: N1/2;  
Secs. 35 and 36:

T. 8 to 12 N., R. 101 W.

T. 7 N., R. 102 W.  
Secs 1 to 5, inclusive;  
Sec. 6: E1/2;  
Sec. 7: E1/2;  
Secs. 8 to 17, inclusive;  
Sec. 18: E1/2;  
Sec. 19: E1/2;  
Secs. 20 to 24, inclusive;  
Sec. 25: N1/2;  
Sec. 26: N1/2;  
Sec. 27: N1/2;  
Sec. 28: N1/2;

T. 8 N., R. 102 W.  
Secs. 1 to 4, inclusive  
Secs. 9 to 15, inclusive;  
Sec. 16: N1/2  
Secs. 22 to 27, inclusive;  
Sec. 32: SE1/4;  
Sec. 33: S1/2;  
Secs. 34, 35, and 36:

T. 9 N., R. 102 W.  
Secs. 1 to 15, inclusive;  
Sec. 16: E1/2;  
Sec. 18: W1/2;  
Sec. 19: W1/2;  
Sec. 21: E1/2;  
Secs. 22 to 27, inclusive;  
Sec. 28: E1/2;  
Sec. 33: E1/2;  
Secs. 34, 35, and 36:

T. 10, 11, and 12 N., R. 102 W.

T. 7 N., R. 103 W.  
Sec. 6:

T. 8 N., R. 103 W.  
Sec. 2: W1/2;  
Secs. 3 to 10, inclusive;  
Sec. 11: W1/2;  
Secs. 16 to 21, inclusive;  
Sec. 28 to 31, inclusive

T. 9 N., R. 103 W.  
Secs. 1 to 35, inclusive;

T. 10, 11, and 12 N., R 103 W.

T. 7 N., R. 104 W.  
Secs. 1 and 2:

T. 8 to 12 N., R. 104 W.

These classifications closed the lands to appropriation under the agricultural land laws and sale under Section 2455 of the revised statutes. Except for eight sites, aggregating 2,010 acres in C-1018, and small areas aggregating 1,348 acres in C-9815, segregated from operation of the mining laws, the classifications did not segregate the lands from operation of the general mining laws or the mineral leasing laws.

The closure to sales and applications under the agricultural land laws focused on correcting a worsening problem of public demand workload that had occupied much of BLM's workforce from the close of World War II. There were few, if any, public lands remaining that qualified under the agricultural land laws, but homestead applications continued to be filed, requiring costly field examination, adjudication, processing of appeals, and nearly always, final rejection of the applications.

A proliferation of sale applications by the public added to the workload, and many of these were rejected because of conflict with long-term resource management objectives for the particular land. High costs were involved in processing these applications. Often, when the lands found suitable for sale were offered, the applicant did not follow through with the sale, even after BLM had gone to the time and expense of classifying and appraising the land. This costly, time-consuming and largely nonproductive response to public demand was highly wasteful of limited human resources available to BLM and did little toward advancing resource management.

The segregation from sale and applications under the agricultural land laws was not and did not absolutely close the land to such disposal. Procedures allowed the filing of petitions for classifications but afforded BLM substantially more control and very significantly reduced the public demand workload.

This interim classification was in anticipation of legislative proposals expected to be developed by the Public Land Law Review Commission established by the act of September 19, 1964 (78 Stat. 982), directing what was finally to be done with the public lands.

The proposals by the commission evolved into legislation enacted as the Federal Land Policy and Management Act of October 21, 1978 (90 Stat. 2743), which stated as policy, among other things, that "the public lands be retained in Federal ownership, unless as the result of the land use planning procedure provided for in this Act, it is determined that disposal of a particular tract will serve the national interest," and "goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise provided by law."



The act further required "uniform procedures for any disposal of public land, acquisition of nonfederal land for public purposes, and the exchange of such lands be established by statute, requiring each disposal, acquisition, and exchange to be consistent with the prescribed mission of the department or agency involved, and reserving to Congress review of disposals in excess of a specified acreage."

Section 702 of the act repealed the homestead laws. Section 703 repealed sale authority under Revised Statutes 2455. The initiative for orderly classification and disposal of lands suitable for transfer to non-federal ownership was placed with BLM.

As part of the long-standing withdrawal review required by Departmental Manual 603 and the new requirements under Section 102(a)(3) and Section 204, FLPMA, these classification were reviewed in 1981.

With repeal of the homestead laws and the Revised Statutes 2455 sale authority, and Congress having stated through FLPMA that the public lands would be retained in federal ownership and managed for multiple use, the interim classifications were deemed to be unnecessary and termination of them was indicated.

By State Director's Order of October 27, 1981, the above classifications were terminated in their entirety. The notice of termination appeared in the Federal Register of November 17, 1981, at pages 55012-13, and opened the lands to operation of the public land laws, effective December 15, 1981, except for the sites that had been closed to the mining laws.

Such termination was not deemed to affect the status of the lands in any practical aspect in the way of limiting or extending what could be done with these lands.

Under C-10844, public lands in Routt County were classified for disposal by order dated August 12, 1970, appearing in the Federal Register of August 20, 1970, at pages 13316 and 13317. The September 11, 1970, Federal Register contains a correction notice of page 14332.

This order classified public lands for disposal as follow:

	Acres
Recreation and Public Purpose Act	
Unintentional Trespass Sale Act	
Sale Under Revised Statutes 2455	14,738.16
Exchange Under Section 8 Taylor Grazing Act	10,580.03

This order segregated the lands from operation of the mining laws and from disposition under laws other than that form of disposal for which the particular parcel was classified.

#### VI. Recreation and Public Purposes Act Classifications\*\*\*

The following described public lands were classified as valuable for public recreational use under the Act of June 14, 1926:

Sixth Principal Meridian, Colorado

T. 9 N., R. 85 W.

- Sec. 3: Lot 19, and SW1/4;
- Sec. 4: Lots 10, 11, 12, 13, 15, 18, 19, and NE1/4 SE1/4;
- Sec. 5: Lots 5, and 8, and Tracts 42A, B, C, D, and E;
- Secs. 6 and 7: Tracts 43A, H, I, P;
- Sec. 10: Lots 1, and 2;

T. 10 N., R. 85 W.

- Sec. 19: Lot 17;
- Sec. 20: Lots 16 and 17;

T. 10 N., R. 85 W.

- Sec. 32: Lots 11, 12, and 13;

T. 11 N., R. 87 W.

- Sec. 20: SE1/4 SE1/4;
- Sec. 21: S1/2 SW1/4, and SW1/4 SE1/4;
- Sec. 28: Lots 1, 2, 4, NW1/4 NE1/4, SE1/2 NE1/4 and NE1/4 NW1/4;

T. 12 N., R. 88 W.

- Sec 14: Lots 5, 6, 9, 10, 11, 12, and 13;

T. 6 N., R. 96 W.

- Sec. 9: NE1/4 SW1/4.

Classification of these lands segregated them from all appropriations, including location under the mining laws. In over 10 years, no proposals or applications affecting these lands have come forth.

\* Recommendations for revocation have been made.

\*\* Revocation order published at 46 FR 55013 (Thursday, November 5, 1981).

\*\*\* Revocation order issued September 8, 1983.

Under C-10844, public lands in Routt County were classified for disposal by order dated August 12, 1970, appearing in the Federal Register of August 20, 1970, at pages 13316, 13317. The September 11, 1970, Federal Register contains a correction notice at page 14333. This order classifies public lands for disposal as follows:

Sale under Revised Statutes 2455	14,738.16 acres
Exchange under Section 8, Taylor Grazing Act	10,580.03 acres

This order segregated the lands from disposition under laws other than that form of disposal for which the particular parcel was classified. It did not close the lands to the mining or mineral leasing laws.

The individual sites in C-1018 that were segregated, and still remain segregated from the mining laws, are:

Sixth Principal Meridian, Colorado

Cedar Springs Draw Site

T. 6 N., R. 97 W.,  
sec. 23, E1/2E1/2SW1/4, W1/2SE1/4;  
sec. 26, W1/2NW1/4NE1/4, E1/2NE1/4NW1/4.

Cross Mountain Site

T. 6 N., R. 98 W.,  
sec. 13, SE1/4NE1/4, S1/2  
sec. 14, SE1/4.

Elk Springs Site

T. 5 N., R. 99 W.,  
sec. 25, NW1/4SW1/4, SE1/4SW1/4, S1/2SE1/4

Divide Creek Site

T. 3 N., R. 100 W.,  
sec. 13, SW1/4

Peterson Draw Site

T. 4 N., R. 100  
sec. 24, S1/2NE1/4.

Disappointment Gulch Site

T. 5 N., R. 100 W.,  
sec. 12, SE1/4  
sec. 13, E1/2  
sec. 24, E1/2

Irish Canyon Site

T. 10 N., R. 101 W.,  
sec. 34, NE1/4NW1/4.

Goodman Gulch Site

T. 10 N., R. 102 W.,  
Sec. 7, W1/2SW1/4NE1/4, E1/2SE1/4NW1/4, W1/2NW1/4SE1/4, NE1/4SW1/4.

These require review under Departmental Manual 603 and Section 204 of the Federal Land Policy and Management Act.

The 1348.42 acres of lands in C-9815, segregated from the mining laws, described below, also require review as to appropriateness of the classification and segregation:

Sixth Principal Meridian, Colorado

- T. 4 N., R. 84 W.,  
sec. 21 NE1/4NE1/4, S1/2NE1/4, and N1/2SE1/4;
- T. 6 N., R. 84 W.,  
sec. 10, SE1/4NE1/4;
- T. 9 N., R. 85 W.,  
sec. 3, lot 19 and SW1/4;  
sec. 4, lots 10, 11, 12, 13, 15, 18, 19, SW1/4NE1/4, and NE1/4SE1/4;  
sec. 5, lots 5 and 8;  
sec. 8, lot 1;  
sec. 10, lots 1 and 2;  
Tracts 42A, 42B, 42C, 42D, 42E, 43A, 43B, 43I, and 43P;
- T. 10 N., R. 85 W.,  
sec. 32, lots 12 and 13;
- T. 3 N., R. 83 W.,  
sec. 14, NW1/4.

BLM motion classifications under the Recreation and Public Purposes Act of 1926, as amended, affect the following sites. Those classifications require vacation as the 18-month limitation of 43 CFR 2741.4(h) has long since passed:

Sixth Principal Meridian, Colorado

Circle Ridge (C-083492)

- T. 11 N., R. 87 W.,  
sec. 20, SE1/4SE1/4;  
sec. 21, S1/2SW1/4 and SW1/4SE1/4;  
sec. 28, lots 1, 2, 4, NW1/4NE1/4, SE1/4NE1/4, and NE1/4NW1/4  
  
containing 379.59 acres.

Willow Creek (C-0123130)

- T. 9 N., R. 85 W.,  
sec. 3, lot 19 and SW1/4;  
sec. 4, lots 10, 11, 12, 13, 15, 18, 19, and NE1/4SE1/4;  
sec. 5, lots A, B, C, D, E, 5, and 8;  
sec. 6, lots A, H, I, and P;  
sec. 10, lots 1 and 2;
- T. 10 N., R. 85 W.,  
sec. 32, lots 11, 12, and 13  
  
containing 947.46 acres.

Cedar Mountain C(C-0124503)

- T. 7 N., R. 91 W.,  
sec. 8, lots 15 and 16;  
sec. 9, lots 10, 11, 12, 13, 14, and 15;  
sec. 16 N1/2, SW1/4, and W1/2SE1/4  
  
containing 888.89 acres.

Hahn's Peak (C-0125482)  
T. 10 N., R. 85 W.,  
sec. 20, lots 16, 17, and 19;  
and Tract 46 in sections 20 and 29  
containing 98.42 acres.

## **Appendix 27**

**Decision - Robert G. Lynn (76 IBLA 383)  
of October 27, 1983**



IN REPLY REFER TO:

# United States Department of the Interior

3103 (622)

BUREAU OF LAND MANAGEMENT  
WASHINGTON, D.C. 20240

June 26, 1984

Instruction Memorandum 84-254, Change 1  
Expires 9/30/85

To: All State Directors

From: Director

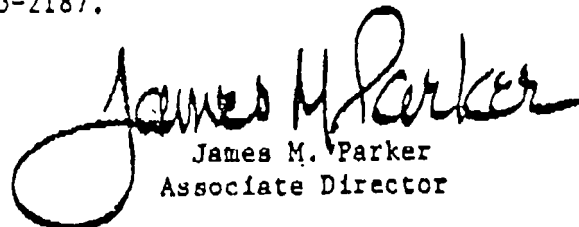
Subject: Robert G. Lynn (76 IBLA 383)

Instruction Memorandum No. 84-254 established a Bureau policy of offering leases to applicants unless the lands applied for were closed to leasing by legislation or regulation, or the lands were included in or under consideration for a formal withdrawal.

However, there are two additional situations where it would not be appropriate to lease. They are:

- o Areas specially closed to leasing by Departmental or Bureau policy, such as wildlife refuges.
- o Areas closed to leasing which represent commitments made to the public through planning or other formal documents. However, such areas should be reexamined in light of the policy established in IM 84-254, and management prescriptions are to be modified accordingly, with appropriate public involvement, at the earliest opportunity in the planning process.

Comments and questions concerning this memorandum should be directed to Greg Shoop or Karl Duscher, FTS 653-2187.

  
James M. Parker  
Associate Director



IN REPLY REFER TO:

# United States Department of the Interior

3101 (620)

BUREAU OF LAND MANAGEMENT  
WASHINGTON, D.C. 20240

February 2, 1984

✓ Instruction Memorandum No. 84-254

Expires: 9/30/85

To: All State Directors

From: Director

Subject: Robert G. Lynn (76 IBLA 383)

The subject decision (enclosed) set aside and remanded BLM's rejection of a non-competitive oil and gas lease offer in the Algodones Dunes Outstanding Natural Area. The IBLA's decision was based on failure of the BLM to consider alternatives to rejection - specifically, that of issuing a lease with a no-surface-occupancy (NSO) stipulation. In consideration of this IBLA decision, you are instructed as follows:

1. If a decision is to be made to reject a lease offer, the record (unless acquired lands administered by a non-Interior agency are involved) must clearly support that leasing, even with a NSO stipulation, is not in the public interest. The justification must be substantive and site specific. Ordinarily, adequate justification should not be possible since a NSO stipulation effectively prevents damage to any resources or land values." Therefore, in virtually all cases, unless lands are excluded from leasing by law, regulation, or are formally withdrawn, applicants should at least be offered a lease with a NSO stipulation. Obviously, a NSO stipulation should only be used as a last resort since BLM is compelled by numerous IBLA decisions to consider whether less restrictive stipulations would suffice to adequately protect the public interest. With respect to acquired lands, please note that the BLM cannot choose to issue a lease with a NSO stipulation if the surface managing agency (SMA) has denied consent to lease. Therefore, for acquired lands offers you should inform the SMA if an applicant is willing to accept a lease with a NSO stipulation and request the SMA to reconsider its denial of consent.
2. If leasing in an area is determined to not be in the public interest even with use of a NSO stipulation, consideration should be given to formally withdrawing the lands involved. The assumption being that any area with resources or values important enough to substantiate rejection of a lease offer should also be capable of meeting the criteria necessary to effect a withdrawal if such action were to be proposed.



In summary, the only areas that are not open to some form of oil and gas leasing should be those closed by legislation or regulation, or those included in or considered eligible for a formal withdrawal. Even though the Secretary has the authority to reject a lease application, such a rejection must be based on reasons and must have considered alternatives up to and including issuance of a lease with a NSO stipulation. As a matter of policy, no lease application should be rejected without first asking the applicant if a NSO stipulated lease would be acceptable.

Comments and questions concerning this Instruction Memorandum should be directed to Karl Duscher, FTS 653-2187.

  
Associate Director

1 Enclosure

Encl. 1 - Decision-Robert G. Lynn (76 IBLA 383) of  
October 27, 1983 (4 pp)



IN REPLY REFER TO:

# United States Department of the Interior

## OFFICE OF HEARINGS AND APPEALS

### INTERIOR BOARD OF LAND APPEALS

4015 WILSON BOULEVARD  
ARLINGTON, VIRGINIA 22203

ROBERT G. LYNN

IBLA 82-912

Decided October 27, 1983

Appeal from decision of California State Office, Bureau of Land Management, rejecting noncompetitive oil and gas lease offer in part. CA 9929.

Set aside and remanded.

1. Oil and Gas Leases: Discretion to Lease

The Secretary has discretion to reject an offer to lease public lands for oil and gas exploration upon a determination supported by facts of record that leasing is not in the public interest because it is not consistent with the character of land classified as an outstanding natural area under 43 CFR Subpart 8352.

2. Oil and Gas Leases: Discretion to Lease

Where an offeror wishes to accept an oil and gas lease subject to a no surface occupancy stipulation, it is error to reject his offer to lease public lands where the record does not show consideration was given to whether issuance of such a lease was in the public interest.

APPEARANCES: John F. Shepherd, Esq., Washington, D.C., for appellant; Lawrence A. McHenry, Esq., Office of the Solicitor, Riverside, California, for Bureau of Land Management.

### OPINION BY ADMINISTRATIVE JUDGE ARNESS

Robert G. Lynn appeals from a decision of the California State Office, Bureau of Land Management (BLM), dated May 11, 1982, rejecting in part his noncompetitive oil and gas lease offer CA 9929. On May 15, 1981, appellant filed an application for 6,936.53 acres of land in T. 13 S., R. 17 E., San Bernardino meridian, California. On May 11, 1982, BLM rejected so much of appellant's lease offer as was located in the Algodones Dunes Outstanding Natural Area. The decision rejecting appellant's offer explains the partial rejection:

A portion of the lands selected within this township are included in the Algodones Dunes Outstanding Natural Area. These lands have been set aside as an outstanding natural area to preserve and protect threatened and endangered plant and animal species in accordance with the Endangered Species Act of 1973. The lands included in this area are northeasterly of the Coachella Canal Right-of-Way, southwesterly of the Niland Glamis County Road and north of State Highway 78. The issuance of an oil and gas lease under the Act of February 25, 1920, is a matter completely within the discretion of the Secretary of the Interior. Haley v. Seaton, 281 F. 2d 620 (D.C. Cir. 1960). Under the circumstances described above, it appears the proper exercise of the discretionary authority is to reject that portion of offer CA 9929 within the Algodones Dunes Outstanding Natural Area. Accordingly, the offer is rejected as to the lands selected within the area described above.

Appellant represents that he holds an oil and gas lease adjacent to the rejected lands which would permit him to use directional drilling to explore and develop the rejected portion of his lease offer without surface entry onto the outstanding natural area. He seeks issuance of a lease with a "no surface occupancy" provision, and points to a prior environmental assessment report (EAR), dated September 1981, which considered the probable effect of geothermal leasing upon the dunes area as a support for his contention that such leasing, especially in his situation as described, is practicable. According to appellant, subsequent to the decision to reject part of appellant's offer within the Algodones Dunes, the area was designated a "wilderness study area" (WSA), pursuant to section 603 of the Federal Land Policy and Management Act of 1976 (FLPMA), 43 U.S.C. § 1782 (1976). The record on appeal establishes that BLM has not considered appellant's desire to accept a no surface occupancy stipulation, nor has it considered the effect upon appellant's offer to lease of the WSA designation. BLM does appear to have considered the 1981 EAR, however, to reach the conclusion that oil and gas exploration would be inconsistent with the character of the area's use as an outstanding natural area.

[1] The discretionary authority of the Secretary to refuse to issue oil and gas leases is not disputed. See Udall v. Tallman, 380 U.S. 1 (1963). The stated aim of the BLM decision to reject appellant's offer is to preserve the character of the land in the dunes which has been classified pursuant to 43 CFR Subparts 2071 and 8352 as an outstanding natural area. The regulation directly applicable, 43 CFR 8352.0-2, provides: "(a) Outstanding natural areas. The objective is to manage for the maximum amount of recreation use possible on outstanding natural areas without damage to the natural features that make the areas outstanding."

In this situation, however, appellant argues that issuance to him of a lease will entail no use of the surface by his exploration effort whatsoever. It is his position that BLM has not considered the use of a no surface occupancy stipulation in this case, or has given the matter insufficient consideration, especially in light of the 1981 EAR which specifically found that exploration of the area for geothermal development could not be entirely excluded as a possible land use.

In a factually similar case, the Board observed in Ida Lee Anderson, 70 IBLA 259 (1983), that, where a lease of lands not withdrawn from the operation of the mineral leasing laws has been refused, the record of the BLM action should establish that BLM first considered whether the public interest could be protected by the use of reasonable stipulations to the lease. See also Mary A. Pettigrew, 64 IBLA 336 (1982). It is not apparent from the record on appeal that full consideration was given to alternatives to outright rejection of appellant's lease offer.

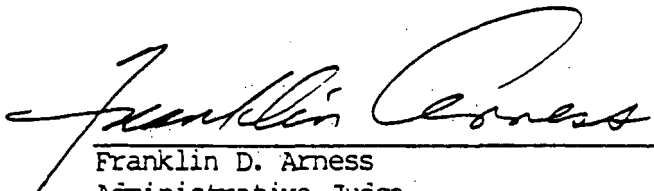
As was the case in Anderson, the EAR prepared for the Algodones Dunes area considers a number of possible alternative uses for the lands. In this case, BLM also prepared, for use with the EAR, a program decision option document which discusses three alternative actions: (1) unrestricted leasing, (2) leasing limited by stipulations restricting surface access and (3) no leasing. The EAR team recommended leasing subject to reasonable stipulations restricting use according to the nature of the land leased. This recommendation was not accepted by the options document, which combined options (2) and (3), and recommended the director close the lands affected by appellant's lease offer to leasing. This approach was adopted by the State Office. Appellant argues that the 1981 EAR, which contemplated only geothermal exploration, was not properly applied nor fully considered by BLM when it decided to reject appellant's oil and gas lease offer. Appellant also contends a no surface occupancy stipulation would adequately protect sensitive animal and plant life within the area. He argues also citing Mountain States Legal Foundation v. Andrus, 499 F. Supp. 383 (D. Wyo. 1980), that rejection of his lease offer under the circumstances of this appeal is improper because there was not compliance with the provisions of section 204 of FLPMA, 43 U.S.C. § 1714 (1976), respecting withdrawal procedures. Finally, he contends leasing of the dunes is permitted despite the WSA designation of the land in controversy as an area "prospectively valuable" for oil and gas. If this be so, a no surface occupancy lease could be issued for the tract, according to appellant's argument, pursuant to BLM Instruction Memorandum No. 83-237 dated January 7, 1983, as changed January 19, 1983.

[2] Appellant correctly contends BLM should have considered the possibility of leasing the land included in the rejected portion of his offer under a no surface occupancy lease. As he points out in his Brief at pages 7 through 10, the 1981 geothermal EAR does not entirely support the BLM decision to reject appellant's lease offer, and is not entirely relevant to his offer, since it does not address the effects of oil and gas exploration. At best it can be said the EAR does observe at page 8 the similarity between the exploration methods used for oil and gas and geothermal operations. Since rejection of a lease offer is more severe than would be the most restrictive special stipulations made to protect the environment, the record here should show that BLM has first considered the use of stipulations to protect the public interest. Robert P. Kunkel, 41 IBLA 77 (1979). The record does not show that BLM considered appellant's expressed wish to accept a no surface occupancy lease, nor does it indicate how the findings of the 1981 geothermal EAR would be inconsistent with such a lease. Clearly, also, BLM has not considered the effect of designation as a WSA of the Algodones Dunes upon appellant's situation. Under the circumstances, the matter is

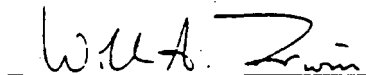
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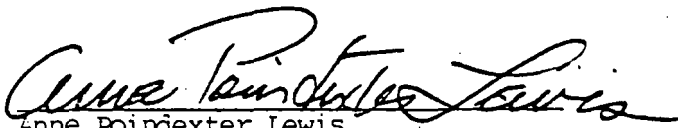
referred to BLM for further evaluation of appellant's offer in the light of this decision. See, e.g., Western Interstate Energy, Inc., 71 IBLA 19 (1983).

Accordingly, pursuant to the authority delegated to the Board of Land Appeals by the Secretary of the Interior, 43 CFR 4.1, the decision appealed from is set aside and remanded for further consideration consistent with this opinion.

  
Franklin D. Arness  
Administrative Judge  
Alternate Member

We concur:

  
Will A. Irwin  
Administrative Judge

  
Anne Poindexter Lewis  
Administrative Judge